

Exhibit A

**Michigan PSC's September 21, 2004 Order
Approving Dobson Cellular Systems, Inc.'s Application for ETC Designation**

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
DOBSON CELLULAR SYSTEMS, INC., for)
designation as an eligible telecommunications)
carrier.)
_____)

Case No. U-14257

At the September 21, 2004 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. J. Peter Lark, Chair
Hon. Robert B. Nelson, Commissioner
Hon. Laura Chappelle, Commissioner

ORDER

On September 1, 2004, Dobson Cellular Systems, Inc. (Dobson), filed an application, pursuant to Section 214(e)(2) of the federal Communications Act of 1934, as amended, 47 USC § 214(e)(2), for designation as an eligible telecommunications carrier (ETC) for purposes of universal service fund support. Dobson explains that on December 22, 2003, Dobson, NPI-Omnipoint Wireless, LLC (NPI)¹, and NOW Licenses, LLC, entered into an asset purchase agreement under which Dobson agreed to purchase substantially all of the operating and other assets of NPI. NPI also agreed to assign to Dobson all of its customer subscriber agreements in the state of Michigan. According to the application, this transaction closed June 17, 2004, at which time NPI ceased

¹ On August 26, 2003, the Commission issued an order in Case No. U-13714 designating NPI as a competitive ETC.

operations and Dobson commenced providing service within NPI's Federal Communication Commission (FCC) licensed service area in Michigan.

In accordance with its purchase of NPI's operating assets, Dobson is applying for ETC designation throughout the wire centers wholly contained within the service area previously served by NPI. Dobson requests that the Commission enter an order immediately designating it as a competitive ETC in the non-rural telephone company wire centers and rural telephone company study areas identified on the Exhibit D to its application. Dobson further seeks designation as a competitive ETC throughout the specific rural telephone company wire centers identified on Exhibit D, subject to the FCC's approval of the Commission's prior decision to redefine the service area requirement in Case No. U-13714. Finally, Dobson asserts that the Commission may act on its application without the necessity of a public hearing.

After reviewing Dobson's application, the Commission finds that it should be granted because the Commission is persuaded that ETC designation for Dobson promotes competition and is in the public interest. Moreover, the Commission concludes, as it did in its November 20, 2001 order in Case No. U-13145 that "...it need not solicit comment on the application, which would only further delay action on the application." Order, Case No. U-13145, p. 4.

The Commission FINDS that:

- a. Jurisdiction is pursuant to 1991 PA 179, as amended, MCL 484.2101 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; and the Commission's Rules of Practice and Procedure, as amended, 1999 AC, R 460.17101 et seq.
- b. The application filed by Dobson for designation as an ETC for purposes of universal service fund support should be granted.

THEREFORE, IT IS ORDERED that the application filed by Dobson Cellular Systems, Inc., pursuant to Section 214(e)(2) of the federal Communications Act of 1934, as amended, 47 USC § 24(c)(2) for designation as an eligible telecommunications carrier for purposes of universal service fund support is granted.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION

/s/ J. Peter Lark

Chair

(S E A L)

/s/ Robert B. Nelson

Commissioner

/s/ Laura Chappelle

Commissioner

By its action of September 21, 2004.

/s/ Mary Jo Kunkle

Its Executive Secretary

Exhibit B

**Dobson Cellular Systems, Inc.'s September 1, 2004
Certified Application for Designation as an Eligible Telecommunications Carrier
Pursuant to Section 214(e)(2) of the Communications Act of 1934**

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Application of Dobson)
Cellular Systems, Inc. for Designation as)
an Eligible Telecommunications Carrier)
Pursuant to Section 214(e)(2) of the)
Communications Act of 1934)
_____)

Case No. U-14257

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APPLICATION

Dobson Cellular Systems, Inc. ("Dobson"), by its attorneys Clark Hill, PLC and Briggs and Morgan, P.A., files this Application with the Michigan Public Service Commission (the "Commission") pursuant to Sections 214(e)(2) of the Federal Communications Act of 1934, as amended (the "Act"),¹ and Sections 201 & 203 of the Michigan Telecommunications Act ("MTA"),² for designation as an eligible telecommunications carrier ("ETC") for purposes of

¹ 47 U.S.C. § 214(e)(2).

² MCL § 484.2201 and 484.2203.

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receiving universal service support in Michigan. In support of this Application, Dobson provides the information set forth below.³

DESCRIPTION OF APPLICANT AND REQUESTED SERVICE AREAS

1. Dobson is incorporated under the laws of the State of Oklahoma, and has its principal place of business at 14201 Wireless Way, Oklahoma City, Oklahoma 73132-2512.

2. Dobson is licensed by the Federal Communications Commission ("FCC") to provide commercial mobile radio service ("CMRS") in sixteen states, including Michigan. Dobson provides CMRS in Michigan under the brand names "CellularOne®" and "NPI Wireless®."

3. On December 22, 2003, Dobson, NPI-Omnipoint Wireless, LLC ("NPI") and NOW Licenses, LLC entered into an Asset Purchase Agreement under which Dobson agreed to purchase substantially all of the operating and other assets of NPI.⁴ NPI also agreed to assign to Dobson all of its customer subscriber agreements in the State of Michigan. This transaction closed June 17, 2004, at which time NPI ceased operations and Dobson commenced providing service within NPI's FCC-licensed service area in the State of Michigan.

4. Until June 17, 2004, NPI provided wireless telecommunications service to approximately 35,000 customers in Michigan. NPI's facilities consisted of 372 cell sites and a Nortel DMS-100 switch. The areas that NPI serviced and for which it held Federal

³ If the Commission so requests, Dobson will immediately supplement this Application with any additional information that the Commission determines is necessary in order to complete its review of this Application.

⁴ The assets conveyed to Dobson by NPI include NPI's licenses and authorizations from the FCC, NPI's Michigan network facilities (including towers, switching and cell site equipment, and microwave equipment), owned and leased real estate, computer systems, accounts receivable and certain contracts.

Communications Commission ("FCC") licenses included areas within the following FCC-defined Basic Trading Areas ("BTAs"): Alpena BTA 011; Grand Rapids BTA 169; Mt. Pleasant BTA 307; Muskegon BTA 310; Petoskey BTA 345; Saginaw BTA 390; Sault Ste. Marie BTA 409, and Traverse City BTA 446 (hereinafter the "Service Area").

5. In March 2003, NPI submitted to the Commission an Application for designation as a competitive ETC. A copy of that Application is attached hereto as **Exhibit A**. On August 26, 2003, the Commission issued an Opinion and Order in Case No. U-13714 designating NPI as a competitive ETC (the "*NPI Order*"). A copy of the *NPI Order* is attached hereto as **Exhibit B**.

6. Dobson's headquarters are in Oklahoma City, Oklahoma, and Dobson is committed to making the necessary investments to continue to provide high quality telecommunications services. As a FCC licensee, Dobson has been deemed financially qualified to provide the services authorized under its cellular license. Dobson is a publicly held company, and its financial statements are available for review at www.dobson.net. Dobson also has extensive experience in the telecommunications and wireless industries. Under the leadership of its management team, which includes Thomas A. Coates, whose affidavit is attached as **Exhibit C**, Dobson has worked to build its network infrastructure and develop its service offerings.

7. In accordance with its purchase of NPI's operating assets, Dobson is applying for ETC designation throughout the wire centers wholly contained within the Service Area previously served by NPI. Dobson requests that the Commission enter an Order immediately designating it as a competitive ETC in the non-rural telephone company wire centers and rural telephone company study areas identified on the attached **Exhibit D**. Dobson further seeks

designation as a competitive ETC throughout the specific rural telephone company wire centers identified on **Exhibit D** subject to the FCC's approval of the Commission's prior decision to redefine the service area requirement in Case No. U-13714 (collectively, the "Designated Areas").

**DOBSON OFFERS ALL THE SERVICES SUPPORTED BY
UNIVERSAL SERVICE MECHANISMS**

8. Dobson commits to offer throughout the Designated Areas the services and functionalities required for designation as an ETC and to advertise their availability and prices using media of general distribution.

9. Section 214(e) of the Act provides that a telecommunications carrier designated as an ETC is eligible to receive universal service support if it:

a. Offers the services that are supported by federal universal service support mechanisms under § 254(c) of the Act, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier);⁵ and

b. Advertises the availability of such services and the charges therefor using media of general distribution.⁶

10. The services or functionalities that are supported by federal universal support mechanisms include:

- a. Voice grade access to the public switched network;
- b. Local usage;

⁵ 47 U.S.C. § 214(e)(1)(A).

⁶ 47 U.S.C. § 214(e)(1)(B).

- c. Dual tone multi-frequency signaling or its functional equivalent;
- d. Single party service or its functional equivalent;
- e. Access to emergency services;
- f. Access to operator services;
- g. Access to interexchange service;
- h. Access to directory assistance; and
- i. Toll limitation for qualifying low income customers.⁷

11. At the time of its original Application, NPI was currently providing or was capable of providing each of the services and functionalities supported by universal service throughout its Service Area over its existing wireless network infrastructure and spectrum and within its current mobile cellular offerings.⁸ Through its purchase of NPI's facilities and other assets, Dobson is now currently providing or is capable of providing each of the services and functionalities supported by universal service throughout the Designated Areas over its existing wireless network infrastructure and spectrum and within its current mobile cellular offerings, as further described in **Exhibit E**. At the time of its original Application, NPI had approved interconnection agreements with Ameritech Michigan and Verizon North Inc. Dobson has now succeeded to those interconnection agreements.⁹

⁷ 47 C.F.R. § 54.101(a)(1-9).

⁸ NPI described its provision of the supported services in more detail in Exhibit B of its original Application.

⁹ At the time of its Application, NPI also had a letter of understanding with CenturyTel of Michigan, Inc. and CenturyTel of Northern Michigan, Inc. that provided for interconnection, but had not formalized a written interconnection agreement with either of the two companies. Dobson has now entered into formal interconnection agreements with both companies.

12. Recognizing that subscribers have a wide variety of needs and usage patterns, Dobson offers a variety of usage plans. Generally, the plan options consist of a fixed monthly rate plus additional variable charges based on usage. Once designated as an ETC in the Designated Areas, Dobson intends to make available to its customers a variety of service offerings that include all the supported services.

13. Dobson currently advertises the availability of its various service offerings and charges using local radio, television, newspapers, telephone directories, the Internet, and billboards. Dobson will continue to use these methods and, if necessary, expand upon them to ensure that all residents within the Designated Areas are informed of Dobson's service offerings.

THE GEOGRAPHIC AREA FOR WHICH ETC DESIGNATION IS SOUGHT

14. Consistent with the Commission's determination in the *NPI Order*, Dobson requests that the Commission grant ETC status to Dobson throughout the exchanges of the landline telephone companies identified in **Exhibit D** (*i.e.*, the Designated Areas).

15. Dobson further requests that the Commission establish "service areas" for purposes of determining universal service support. The Act allows the Commission to designate "service areas" for purposes of determining universal service support obligations and support mechanisms.¹⁰ Dobson requests that its "service area" be the Designated Areas for purposes of determining universal service support obligations and support mechanisms, and states that such designation is in the public interest.¹¹

¹⁰ 47 U.S.C. § 214(e)(2) & 214(e)(5).

¹¹ In the *NPI Order*, the Commission addressed redefinition of the service area requirement subject to NPI's obligation to petition the FCC for its approval of the Commission's service area redefinition pursuant to Section 214(e)(5). *NPI Order*, pp. 13-16. NPI never completed the process of petitioning the FCC for approval of the *NPI Order*. Once designated as an ETC,

16. Dobson will offer the services required for the federal universal support mechanisms under § 254(c) in the Designated Areas using its own facilities or a combination of its own facilities and the resale of another carrier's services. Dobson will advertise the availability of those services and the charges for those services using one or more media of general distribution. Dobson currently provides or is capable of providing each of the services and functionalities supported by universal service using its existing cellular infrastructure and spectrum within its current mobile cellular offerings. Accordingly, Dobson has met the requirements necessary to be designated as an eligible telecommunications carrier for purposes of receiving universal support in accordance with § 254 of the Act.

STATEMENT OF PUBLIC INTEREST

17. The FCC has determined that wireless providers may be designated as ETCs,¹² and the Commission has determined that designation of wireless providers as an ETC is in the public interest.¹³ The FCC and the Commission have recognized that designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, promoting innovative services and new technologies, and encouraging affordable telecommunications services.¹⁴ Dobson is dedicated to serving rural areas of the State

Dobson commits to filing a petition with the FCC for approval of Dobson's service area as defined by the Commission.

¹² *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, FCC 97-157, ¶¶ 145-147 (rel. May 8, 1997) ("Universal Service Order").

¹³ *In the Matter of the Application of RFB Cellular, Inc. for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act of 1934*, Case No. U-13145, *Opinion and Order*, p. 3 (rel. Nov. 20, 2001) ("RFB Order").

¹⁴ *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Memorandum Opinion and Order*, 12 FCCR 48, ¶ 17 (2000); *RFB Order*, p. 3.

where there are few choices for competitive local telephone services. Consumers will benefit from Dobson's expanded local calling area, which makes intrastate toll calls more affordable. In addition, Dobson's designation will provide consumers in rural and high-cost areas with the following specific benefits: mobility, increased consumer choice, support for advanced services and data services, better customer service, competitive incentives for the incumbent carriers to operate more efficiently, improve customer service, lower their prices, and make their offerings more attractive, and increased investment in the Michigan telecommunications infrastructure. Therefore, designating Dobson as an ETC will be in the public interest.

**DOBSON WILL MEET ALL OF THE ETC OBLIGATIONS
PREVIOUSLY ASSUMED BY NPI AS A COMPETITIVE ETC**

18. Because Dobson has acquired NPI's operating assets and thereby provides wireless telecommunications services to NPI's former subscribers throughout the Designated Areas, Dobson has already implicitly assumed NPI's obligations and commitments as an ETC under the *NPI Order*. Dobson uses the same network and serves the same geographic areas which the Commission recently determined satisfied the ETC requirements as applied to NPI. Moreover, consumers within the Designated Areas will realize the same public interest benefits through Dobson's continued service in these areas. Dobson hereby commits to complying with all of the obligations and commitments assumed by NPI pursuant to its designation as a competitive ETC, and also hereby commits to comply with all applicable federal and state requirements.

19. For the reasons stated above, Dobson hereby requests the Commission to immediately issue an Order designating it as a competitive ETC throughout the Designated Areas, so that the Company can become eligible to receive federal universal service support for provision of the supported services in these areas.

NO HEARING REQUIRED

20. This Application may be approved and the requested ETC designation may be made without the time and expense of a hearing. Neither the MTA nor any other law requires that a hearing be held.

21. In the *NPI Order*, the Commission provided a clear statement of its view on the value of a hearing in this context:

“Virtually every argument raised by the parties in opposition to NPI’s Application, however, has been addressed previously. No new information was brought to the Commission’s attention that would persuade the Commission that designating a competitive carrier ETC status in an area serviced by a rural ILEC would be contrary to the public interest.”¹⁵

The Commission has previously considered eight applications for ETC status in Michigan other than NPI’s. In six of the cases, no hearing took place.¹⁶ In the two remaining designations,¹⁷ the

¹⁵ *NPI Order*, p 12 (emphasis added).

¹⁶ *In the Matter of the Application of Ameritech Michigan for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving High Cost, Low Income and Rural Healthcare Funding Assistance*, Case No. U-11547, *Opinion and Order* (rel. Nov. 25, 1997); *In the matter of the Application of the Michigan Exchange Carriers Association, Inc., for Certification of its Members and Frontier Communications of Michigan, Inc., as Eligible Telecommunication Carriers for Universal Service Purposes*, Case No. U-11548, *Opinion and Order* (rel. Nov. 25, 1997); *In the Matter of the Joint Application of GTE North Incorporated and Contel of the South, Inc., for Designation as Eligible Telecommunications Carriers under 47 USC 214(e) for their Certified Service Areas*, Case No. U-11555, *Opinion and Order* (rel. Nov. 25, 1997); *In the Matter of the Application of Brooks Fiber Communications of Michigan, Inc., d/b/a Brooks Fiber Communications, for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving High Cost, Low Income, and Rural Healthcare Funding Assistance*, Case No. U-11592, *Order* (rel. Feb. 25, 1998); *RFB Order*; *In the Matter of the Application of Thumb Cellular, LP, for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Communications Act of 1934*, Case No. U-13618, minute action adopted December 6, 2002.

¹⁷ *In the Matter of the Application of Michiana Metronet, Inc., Centennial Michigan RSA 6 Cellular Corp., and Centennial Michigan RSA 7 Cellular Corp., for Designation as Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act of 1934*, Case No. U-13751, *Opinion and Order*, p. 14 (rel. Sept. 11, 2003); *In the Matter of the*

Commission's Orders contain statements similar to the one quoted above. The Commission determined, in Case No. U-13145, that there was no need to even solicit comments on an ETC application because doing so would only delay the designation.¹⁸ Because the Commission has fully considered the issues of designating a competitive ETC, and has repeatedly found that no new information or arguments are presented in ETC designation hearings, no useful purpose would be served by incurring the time and expenses of yet another hearing in this proceeding.

22. Moreover, a hearing was held in the proceeding that resulted in the *NPI Order*. The issue there was the same as the issue currently presented – whether a wireless carrier should be designated as an ETC within the Designated Areas. The result of the hearing was a finding that NPI met the applicable ETC requirements consistent with the public interest and subject to redefinition of the service area requirement as necessary. Dobson has acquired NPI's operating assets and, through those assets, serves the same areas in which NPI was designated. There is no need to conduct another hearing to find that Dobson, using the same assets and serving the same areas as NPI, will also meet the ETC requirements.

Application of Alltel Communications, Inc., for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934, Case No. U-13765, Opinion and Order, p. 12 (rel. Sept. 11, 2003).

¹⁸ *RFB Order*, p 4.

RELIEF

WHEREFORE, Dobson respectfully requests that the Commission, either by order or minute action without a hearing, designate Dobson as a competitive telecommunications carrier throughout the Designated Areas for purposes of receiving federal universal service support in Michigan.

Dated: September 1, 2004

CLARK HILL, PLC



A handwritten signature in black ink, appearing to read "Roderick S. Coy".

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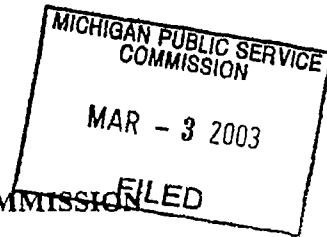
Attorneys for Dobson Cellular Systems, Inc.

EXHIBIT A

**NPI'S MARCH 3, 2003 APPLICATION FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION



In the matter of the application of NPI-)
OMNIPOINT WIRELESS, LLC for)
designation as an eligible)
telecommunications carrier pursuant to)
Section 214(e)(6) of the Communications)
Act of 1934)
_____)

Case No. U-13714

Priya Marwah Doornbos (P63284)
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_____ /

APPLICATION

NPI-Omnipoint Wireless, LLC ("NPI"), by its attorneys Warner Norcross & Judd LLP, files this Application with the Michigan Public Service Commission (the "Commission") pursuant to Sections 214(e)(6) of the Federal Communications Act of 1934, as amended (the "Act"),¹ and Sections 201 and 203 of the Michigan Telecommunications Act ("MTA"),² for designation as an eligible telecommunications carrier ("ETC") for purposes of

¹ 47 USC § 214(e)(6).

² MCL 484.2201 and 484.2203.

receiving universal service support in Michigan. In support of this Application, NPI provides the information set forth below.³

DESCRIPTION OF APPLICANT AND ITS SERVICE AREA

1. NPI is a Michigan limited liability company with a principal office located at 3054 Cass Rd., P.O. Box 879, Traverse City, Michigan 49684.

2. NPI provides wireless telecommunications service to approximately 35,000 customers in Michigan. NPI's network consists of 372 cell sites and a Nortel DMS-100 switch. The areas that NPI services and for which it holds Federal Communications Commission ("FCC") licenses include the following FCC defined Basic Trading Areas ("BTAs"): Alpena BTA 011, Grand Rapids BTA 169, Mt. Pleasant BTA 307, Muskegon BTA 310, Petoskey BTA 345, Saginaw BTA 390, Sault Ste. Marie BTA 409, and Traverse City BTA 446 (hereinafter the "Service Area").

3. NPI's headquarters are in Traverse City, Michigan, and NPI is committed to making the necessary investments to provide high quality telecommunications services in its Service Area. As a FCC licensee, NPI has been deemed financially qualified to provide the services authorized under its cellular license. NPI is a privately held company and its financial statements are not public information; however, if deemed necessary, NPI will provide the Commission with its most recent audited financial statements. NPI also has extensive experience in the telecommunications and wireless industries. Under the leadership of Frank E. Noverr, whose affidavit is attached as Exhibit A, NPI's management team has worked together since 1997 to build NPI's network infrastructure and develop its service offerings.

³ NPI will immediately supplement this Application with any additional information that the Commission determines is necessary in order to complete its review of this Application.

**NPI OFFERS ALL THE SERVICES SUPPORTED BY
UNIVERSAL SERVICE MECHANISMS**

5. NPI commits to offer in Michigan the services and functionalities required for designation as an ETC and to advertise their availability and prices using media of general distribution.

6. Section 214(e) of the Act provides that a telecommunications carrier designated as an ETC is eligible to receive universal service support if it:

a. Offers the services that are supported by federal universal service support mechanisms under § 254(c) of the Act, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier);⁴ and

b. Advertises the availability of such services and the charges therefor using media of general distribution.⁵

7. The services or functionalities that are supported by federal universal support mechanisms include:

- a. Voice grade access to the public switched network;
- b. Local usage;
- c. Dual tone multi-frequency signaling or its functional equivalent;
- d. Single party service or its functional equivalent;
- e. Access to emergency services;
- f. Access to operator services;
- g. Access to interexchange services;

⁴ 47 USC § 214(e)(1)(A).

⁵ 47 USC § 214(e)(1)(B).

- h. Access to directory assistance; and
- i. Toll limitation for qualifying low income customers.⁶

8. As set forth in Exhibit B, NPI currently provides or is capable of providing each of the services and functionalities supported by universal service throughout its Service Area over its existing wireless network infrastructure and spectrum and within its current mobile cellular offerings. NPI has approved interconnection agreements with Ameritech Michigan and Verizon North Inc.⁷

9. Recognizing that subscribers have a wide variety of needs and usage patterns, NPI offers a variety of usage plans. Generally, the plan options consist of a fixed monthly rate plus additional variable charges based on usage. Once designated as an ETC, NPI intends to make available to its customers a "universal service" offering that includes all the supported services.

10. NPI currently advertises the availability of its various service offerings and charges using local radio, television, newspapers, telephone directories, the Internet, and billboards. NPI will continue to use these methods and, if necessary, expand upon them to ensure that all residents within its Service Area are informed of NPI's offering.

THE GEOGRAPHIC AREA FOR WHICH ETC DESIGNATION IS SOUGHT

11. NPI requests that the Commission grant ETC status to NPI in the counties covered by Alpena BTA 011, Grand Rapids BTA 169, Mt. Pleasant BTA 307, Muskegon BTA 310, Petoskey BTA 345, Saginaw BTA 390, Sault Ste. Marie BTA 409, and Traverse City BTA 446, and the exchanges of the landline telephone companies located therein, as identified in Exhibit C.

⁶ 47 CFR 54.101.

⁷ NPI also has a letter of understanding with CenturyTel of Michigan, Inc. and CenturyTel of Northern Michigan, Inc. that provides for interconnection. NPI has not formalized a written interconnection agreement with the two companies.

12. NPI further requests that the Commission establish "service areas" for purposes of determining universal service support. The Act allows the Commission to designate "service areas" for purposes of determining universal service support obligations and support mechanisms.⁸ NPI requests that its "service area" be NPI's Service Area for purposes of determining universal service support obligations and support mechanisms, and states that such designation is in the public interest.

14. NPI will offer the services required for the federal universal support mechanisms under § 254(c) in its Service Area using its own facilities or a combination of its own facilities and the resale of other carriers' services. NPI will advertise the availability of those services and the charges for those services using one or more media of general distribution. NPI currently provides or is capable of providing each of the services and functionalities supported by universal service using its existing cellular infrastructure and spectrum within its current mobile cellular offerings. Accordingly, NPI has met the requirements necessary to be designated as an eligible telecommunications carrier for purposes of receiving universal support in accordance with § 254 of the Act.

STATEMENT OF PUBLIC INTEREST

15. The FCC has determined that wireless providers may be designated as ETCs,⁹ and the Commission has determined that designation of wireless providers as an ETC is in the public interest.¹⁰ The FCC and the Commission have recognized that designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing

⁸ 47 USC 214(e)(2) & (5).

⁹ *Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, 12 FCCR 8776, 98858-59, ¶¶ 145-147 (1997).

¹⁰ *In re Application of RFB Cellular, Inc. for Designation as an Eligible Telecommunications Carrier*, Case No. U-13145, p 3 (Nov. 20, 2001).

customer choice, promoting innovative services and new technologies, and encouraging affordable telecommunications services.¹¹ NPI is dedicated to serving rural areas of the State where there are few choices for competitive local telephone services. Consumers will benefit from NPI's expanded local calling area, which makes intrastate toll calls more affordable. Therefore, designating NPI as an ETC will be in the public interest.

NO HEARING REQUIRED

16. This Application may be approved and the requested ETC designation may be made without the time and expense of a hearing. Neither the MTA nor any other law requires that a hearing be held. In the Commission's Order in Case No. U-13145, it concluded that it need not solicit comment on the application for designation as an ETC since it would only further delay the application.¹² Therefore, no notice of hearing is required.

¹¹ *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming; Federal-State Joint Board on Universal Service*, Memorandum Opinion and Order, CC Docket No. 96-45, 12 FCCR 48, ¶ 17 (2000); *In re Application of RFB Cellular, Inc. for Designation as an Eligible Telecommunications Carrier*, Case No. U-13145, p 3 (Nov. 20, 2001).

¹² *In re Application of RFB Cellular, Inc. for Designation as an Eligible Telecommunications Carrier*, Case No. U-13145, p 4 (Nov. 20, 2001).

RELIEF

WHEREFORE, NPI-Omnipoint Wireless, LLC respectfully requests that the Commission, either by order or minute action without a hearing within ninety (90) days from the date of this Application, designate NPI as an eligible telecommunications carrier for purposes of receiving federal universal service support in Michigan.

Respectfully submitted,
WARNER NORCROSS & JUDD LLP

Dated: February 28, 2003

By: Priya Marwah Doornbos
Priya Marwah Doornbos (P63284)

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Attorney for NPI

#836238 WXP

EXHIBIT A
CERTIFICATION

I, Frank E. Noverr, hereby certify as follows:

1. I am President of NPI-Omnipoint Wireless, LLC ("NPI"). NPI holds Federal Communications Commission ("FCC") licenses to provide wireless telecommunications service in the markets designated as Alpena BTA 011, Grand Rapids BTA 169, Mt. Pleasant BTA 307, Muskegon BTA 310, Petoskey BTA 345, Saginaw BTA 390, Sault Ste. Marie BTA 409, and Traverse City BTA 446.

2. I provide this certification in support of NPI's Application for Designation as an Eligible Telecommunications Carrier ("ETC") in Michigan. NPI is seeking designation as an ETC under Section 214(e)(6) of the Communications Act of 1934, as amended, so that it can serve the universal service needs of the consumers residing in its Service Area.

3. For the reasons set forth in NPI's Application, NPI meets the criteria for ETC designation under Section 214(e)(6).

The foregoing is true to the best of my knowledge, information, and belief.

Dated: February __, 2003



Frank E. Noverr

EXHIBIT B
SUPPORTED SERVICES

1. **Voice Grade Access to the Public Switched Network.** NPI currently provides voice-grade access to the public switched telephone network. NPI is able to originate and terminate voice-grade telephone service for all its subscribers through interconnection agreements with landline carriers.
2. **Local Usage.** Although the FCC has not set a minimum local usage requirement, NPI offers service options that include a fixed monthly rate plus additional variable charges based on usage.
3. **Dual Tone Multi-Frequency Signaling or its Functional Equivalent.** NPI, like other wireless carriers, uses in-band signaling in its system. The FCC has held in *Universal Service Order*, 12 FCCR at 8776, ¶ 71, that signaling used by mobile carriers is functionally equivalent to DTMF signaling and thus meets the requirement.
4. **Single-Party Service or its Functional Equivalent.** NPI offers the functional equivalent of single-party service by providing a dedicated message path for the duration of a subscriber's call. The FCC has held in *Universal Service Order*, 12 FCCR at 8776, ¶ 62, that to the extent that wireless providers use spectrum shared among users to provide service, wireless providers offer the equivalent of a single-party service when they offer a dedicated message path for the length of a user's particular transmission.
5. **Access to Emergency Services.** Access to emergency services includes access to 911 and enhanced 911 to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems. NPI currently offers subscribers access to 911 emergency services throughout its cellular service area by dialing "911."
6. **Access to Operator Services.** This is defined as any automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call. NPI currently offers such access throughout its service area.
7. **Access to Interexchange Services.** NPI provides its customers with the ability to access interexchange service and to make and receive interexchange calls.
8. **Access to Directory Assistance.** NPI meets this requirement by providing subscribers throughout its service areas with access to directory assistance by dialing "411."
9. **Toll Limitation for Qualifying Low-Income Customers.** An ETC must offer either "toll control" or "toll blocking" services to Lifeline subscribers at no charge. As part of its universal service offering, NPI will offer a service option to qualifying low-income customers that provides toll limitation services.

EXHIBIT C
NPI'S SERVICE AREA

NPI's Service Area encompasses the following FCC defined Basic Trading Areas ("BTAs"): Alpena BTA 011, Grand Rapids BTA 169, Mt. Pleasant BTA 307, Muskegon BTA 310, Petoskey BTA 345, Saginaw BTA 390, Sault Ste. Marie BTA 409, and Traverse City BTA 446. NPI requests ETC designation in the exchanges of the following landline telephone companies that are located in NPI's Service Area:

Ace Telephone Company of Michigan, Inc.

Ameritech Michigan

Century Telephone of Michigan, Inc.

CenturyTel of Upper Michigan, Inc.

Chippewa County Telephone Company

Hiawatha Telephone Company

Peninsula Telephone Company

Pigeon Telephone Company

Upper Peninsula Telephone Company

Verizon North Inc.

The Winn Telephone Company

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * *

Case No. U-13714

In the matter, on the Commission's
Own Motion, on the Certification of
Eligible Telecommunications Carriers

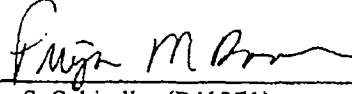
**NPI-OMNIPPOINT WIRELESS, LLC AMENDED FILING PURSUANT TO THE
AUGUST 26, 2003, ORDER OF THE MICHIGAN PUBLIC SERVICE COMMISSION**

NPI-Omnipoint Wireless, LLC ("NOW"), by its attorneys Warner Norcross & Judd LLP, submits this amended filing pursuant to the Opinion and Order of the Michigan Public Service Commission (the "Commission") dated August 26, 2003. Specifically, the Commission ordered NOW to file "a listing of the exchanges where it currently provides service or intends to provide service under its license and for which it wishes to receive universal service support and is able to meet universal service obligations." *In the matter of the application of NPI-Omnipoint Wireless, LLC, for designation as an eligible telecommunications carrier pursuant to Section 214(e)(6) of the Communications Act of 1934*, Opinion and Order, Case No. U-13714, p. 17(Aug. 26, 2003).

The list of exchanges where NOW currently provides service or intends to provide service under its license and for which it wishes to receive federal universal service support and is able to meet universal service obligations is attached as Exhibit A. NOW's previous filing only included those exchanges in which NOW currently provides service and omitted those exchanges in which NOW has a license to provide service and for which it wishes to receive federal universal service support.

Respectfully Submitted,

NPI-OMNIPPOINT WIRELESS, LLC



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965951-1

NPI-Omnipoint Wireless, LLC
Exchanges Licensed in Michigan

NPA-NXX	DESCRIPTION	COMPANY	CELL CODE
231-269	BUCKLEY	ACE TELEPHONE CO. OF MICHIGAN, INC.	BCKLMIXIRS1
231-369	SOBOARDMAN	ACE TELEPHONE CO. OF MICHIGAN, INC.	SBRDMIXIRS0
231-862	HOXEYVILLE	ACE TELEPHONE CO. OF MICHIGAN, INC.	HXVLMIXIRS0
231-885	MESICK	ACE TELEPHONE CO. OF MICHIGAN, INC.	MSCKMIXIDS1
231-341	CHEBOYGAN	AIRTOUCH PAGING	GDRPMIBLCM9
231-339	MUSKEGON	AIRTOUCH PAGING	GDRPMIBLCM9
231-382	CADILLAC	AIRTOUCH PAGING	GDRPMIBLCM9
231-494	BIG RAPIDS	AIRTOUCH PAGING	GDRPMIBLCM9
231-512	TRAVERSECY	AIRTOUCH PAGING	GDRPMIBLCM9
231-532	KALKASKA	AIRTOUCH PAGING	GDRPMIBLCM9
231-569	PETOSKEY	AIRTOUCH PAGING	GDRPMIBLCM9
231-628	MANISTEE	AIRTOUCH PAGING	GDRPMIBLCM9
231-837	FREMONT	AIRTOUCH PAGING	GDRPMIBLCM9
616-529	GRANDHAVEN	AIRTOUCH PAGING	GDRPMIBLCM9
989-805	MIDLAND	AIRTOUCH PAGING	SGNWMIFACM1
231-291	INDIAN RIV	ALPINE PCS, INC.	ELTPMIAACM0
989-300	GAYLORD	ALPINE PCS, INC.	GYLRMIACIMD
231-221	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-237	CHARLEVOIX	AMERITECH MICHIGAN	CHVXMIMNRS0
231-238	INDIAN RIV	AMERITECH MICHIGAN	INRVIMMNRSA
231-242	HARBOR SPG	AMERITECH MICHIGAN	HRSPMIMNRS0
231-256	LKLEELANAU	AMERITECH MICHIGAN	LKLLMIMNRS0
231-258	KALKASKA	AMERITECH MICHIGAN	KLKSMIKKDS0
231-264	ELK RAPIDS	AMERITECH MICHIGAN	ELKRMIMNDS0
231-266	IRONS	AMERITECH MICHIGAN	IRONMIMNRS1
231-267	WILLIAMSBG	AMERITECH MICHIGAN	WLBGMWBRSA
231-276	INTERLOCHN	AMERITECH MICHIGAN	GRWNMIMNRS0
231-347	PETOSKEY	AMERITECH MICHIGAN	PTSKMIMNDS0
231-348	PETOSKEY	AMERITECH MICHIGAN	PTSKMIMNDS0
231-352	FRANKFORT	AMERITECH MICHIGAN	FRFTMIMNRS0
231-354	CORAL	AMERITECH MICHIGAN	TRFNMIMNRS0
231-386	NORTHPORT	AMERITECH MICHIGAN	NPRTMIMNRS0
231-389	HARRIETTA	AMERITECH MICHIGAN	HRTAMIMNRS0
231-398	MANISTEE	AMERITECH MICHIGAN	MNSTMIMNDS0
231-436	MACKINAWCY	AMERITECH MICHIGAN	MCCYMIMNRS0
231-439	PETOSKEY	AMERITECH MICHIGAN	PTSKMIMNDS0
231-464	FREESOIL	AMERITECH MICHIGAN	FONTMIMNRS0
231-487	PETOSKEY	AMERITECH MICHIGAN	PTSKMIMNDS0
231-525	WOLVERINE	AMERITECH MICHIGAN	WLVRMIMNRS0
231-526	HARBOR SPG	AMERITECH MICHIGAN	HRSPMIMNRS0
231-527	BIG RAPIDS	AMERITECH MICHIGAN	BGRPMIMNDS0
231-535	WALLOON LK	AMERITECH MICHIGAN	WNLKMIWLS1
231-536	EASTJORDAN	AMERITECH MICHIGAN	EJRDIMMNRSA
231-539	PELLSTON	AMERITECH MICHIGAN	PLSTMIMNRS0
231-547	CHARLEVOIX	AMERITECH MICHIGAN	CHVXMIMNRS0
231-582	BOYNE CITY	AMERITECH MICHIGAN	BOCYMIBCD0
231-587	MANCELONA	AMERITECH MICHIGAN	MNCLMIMNRS0
231-591	BIG RAPIDS	AMERITECH MICHIGAN	BGRPMIMNDS0
231-592	BIG RAPIDS	AMERITECH MICHIGAN	BGRPMIMNDS0
231-597	CHEBOYGAN	AMERITECH MICHIGAN	CHBYMIMNRS0
231-625	CHEBOYGAN	AMERITECH MICHIGAN	CHBYMISORSA

231-627	CHEBOYGAN	AMERITECH MICHIGAN	CHBYMIMNRS
231-652	NEWAYGO	AMERITECH MICHIGAN	NWAYMINWDS0
231-689	WHITECLOUD	AMERITECH MICHIGAN	WHCLMIADRS
231-723	MANISTEE	AMERITECH MICHIGAN	MNSTMIMNDS0
231-734	EVART	AMERITECH MICHIGAN	EVRTMIMNDS0
231-743	MARJON	AMERITECH MICHIGAN	MARNMIMNRS
231-757	SCOTTVILLE	AMERITECH MICHIGAN	SCVLMIMNDS0
231-768	LE ROY	AMERITECH MICHIGAN	LROYMIMNRS
231-775	CADILLAC	AMERITECH MICHIGAN	CDLCMIMNDS0
231-779	CADILLAC	AMERITECH MICHIGAN	CDLCMIMNDS0
231-796	BIG RAPIDS	AMERITECH MICHIGAN	BGRPMIMNDS0
231-797	LUTHER	AMERITECH MICHIGAN	LTHRMIMNRS
231-824	MANTON	AMERITECH MICHIGAN	MNTNMIMNRS
231-825	MCBAIN	AMERITECH MICHIGAN	MCBNMIMNRS1
231-829	TUSTIN	AMERITECH MICHIGAN	TUSTMIMNRS
231-832	REED CITY	AMERITECH MICHIGAN	RDCYMIMNRS
231-834	GRANT	AMERITECH MICHIGAN	GRNTMIMNRS
231-856	MORLEY	AMERITECH MICHIGAN	MRLYMIMNRS
231-876	CADILLAC	AMERITECH MICHIGAN	CDLCMIMNDS0
231-879	FIFE LAKE	AMERITECH MICHIGAN	FFLKMIMNRS
231-882	BEULAH	AMERITECH MICHIGAN	BELHMIMNRS
231-889	ONEKAMA	AMERITECH MICHIGAN	ONKMMIMNRS
231-890	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-922	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-924	FREMONT	AMERITECH MICHIGAN	FRMTMIMNRS
231-928	FREMONT	AMERITECH MICHIGAN	FRMTMIMNRS
231-929	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-932	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-933	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-935	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-941	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-943	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-946	TRAVERSECY	AMERITECH MICHIGAN	GRWNMIMNRS0
231-947	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
231-995	TRAVERSECY	AMERITECH MICHIGAN	TRCYMIMNDS1
616-225	GREENVILLE	AMERITECH MICHIGAN	GNVLMIMNRS1
616-296	GRANDHAVEN	AMERITECH MICHIGAN	GRHVMIMNDS0
616-536	SAND LAKE	AMERITECH MICHIGAN	SDLKMIMNRS
616-696	CEDAR SPG	AMERITECH MICHIGAN	CDSPMIMNRS
616-794	BELDING	AMERITECH MICHIGAN	BLDNMIMNRS
616-842	GRANDHAVEN	AMERITECH MICHIGAN	GRHVMIMNDS0
616-844	GRANDHAVEN	AMERITECH MICHIGAN	GRHVMIMNDS0
616-846	GRANDHAVEN	AMERITECH MICHIGAN	GRHVMIMNDS0
616-847	GRANDHAVEN	AMERITECH MICHIGAN	GRHVMIMNDS0
616-850	GRANDHAVEN	AMERITECH MICHIGAN	GRHVMIMNDS0
989-246	GLADWIN	AMERITECH MICHIGAN	GLDWMIGLDS0
989-343	WESTBRANCH	AMERITECH MICHIGAN	WBRNMIMNRS
989-345	WESTBRANCH	AMERITECH MICHIGAN	WBRNMIMNRS
989-362	EAST TAWAS	AMERITECH MICHIGAN	ETWSMIMNRS
989-389	ST HELEN	AMERITECH MICHIGAN	STHLMIMNRS
989-426	GLADWIN	AMERITECH MICHIGAN	GLDWMIGLDS0
989-433	ROSEBUSH	AMERITECH MICHIGAN	RSBHMIMNRS0
989-435	BEAVERTON	AMERITECH MICHIGAN	BVTNMIVTDS0
989-465	COLEMAN	AMERITECH MICHIGAN	CLMNMIMNRS
989-495	MIDLAND	AMERITECH MICHIGAN	MDLDMISERS
989-496	MIDLAND	AMERITECH MICHIGAN	MDLDMISERS
989-539	HARRISON	AMERITECH MICHIGAN	HRSNMIMNDS0
989-544	FARWELL	AMERITECH MICHIGAN	FRWLMWRSR1

989-588	FARWELL	AMERITECH MICHIGAN	FRWLMIMNRS
989-631	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-633	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-636	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-638	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-739	OSCODA	AMERITECH MICHIGAN	OSCDMIMNRS
989-747	OSCODA	AMERITECH MICHIGAN	OSCDMIMNRS
989-832	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-835	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-837	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-839	MIDLAND	AMERITECH MICHIGAN	MDLDMIMNDS0
989-846	STANDISH	AMERITECH MICHIGAN	STNDMIMNRS
989-984	EAST TAWAS	AMERITECH MICHIGAN	ETWSMIMNRS
231-274	TRAVERSECY	AMERITECH MOBILE SERVICES, INC.	GDRPMICXCM0
231-416	BIG RAPIDS	AMERITECH MOBILE SERVICES, INC.	GDRPMICXCM0
231-514	CADILLAC	AMERITECH MOBILE SERVICES, INC.	GDRPMICXCM0
231-516	PETOSKEY	AMERITECH MOBILE SERVICES, INC.	GDRPMICXCM0
231-615	CHEBOYGAN	AMERITECH MOBILE SERVICES, INC.	GDRPMICXCM0
231-712	MUSKEGON	AMERITECH MOBILE SERVICES, INC.	GDRPMICXCM0
616-239	GREENVILLE	AMERITECH MOBILE SERVICES, INC.	GDRPMICXCM0
989-477	WESTBRANCH	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-478	GRAYLING	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-489	OSCODA	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-490	GAYLORD	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-518	HIGGINS LK	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-603	ALPENA	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-604	HOUGHTON LK	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-612	MTPLEASANT	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-924	ALMA	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
989-926	MIDLAND	AMERITECH MOBILE SERVICES, INC.	SGNWMIACCM0
231-204	FIFE LAKE	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-214	LE ROY	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-255	ONEKAMA	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-303	MARION	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-304	MORLEY	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-310	GRANT	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-315	MUSKEGON	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-317	BOYNE CITY	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-318	TRAVERSECY	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-336	LUDINGTON	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-405	NEWAYGO	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-428	HART	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-502	CADILLAC	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-503	TRAVERSECY	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-593	CADILLAC	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-596	HARBOR SPG	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-604	KALKASKA	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-605	NEWAYGO	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-606	BIG RAPIDS	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-607	CHEBOYGAN	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-608	FRANKFORT	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-609	CORAL	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-610	PELLSTON	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-619	PETOSKEY	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-704	FREESOIL	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-931	MANCELONA	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
231-952	WOLVERINE	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
616-215	GREENVILLE	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0

616-305	CASNOVIA	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
616-507	SAND LAKE	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
616-576	GRANDHAVEN	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
616-595	GREENVILLE	ARCH WIRELESS HOLDINGS, INC.	GDRPMIBHCM0
989-208	EAST TAWAS	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-247	MIDLAND	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-454	MIDLAND	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-554	EAST TAWAS	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-558	STANDISH	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-562	WESTBRANCH	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-591	ALPENA	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-594	GAYLORD	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-677	ALMA	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
989-679	MTPLEASANT	ARCH WIRELESS HOLDINGS, INC.	SGNWMIA TCM1
231-534	TRAVERSECY	AT&T LOCAL	GDRPMIBLXMX
231-672	MUSKEGON	AT&T LOCAL	GDRPMIBLDS2
989-492	MIDLAND	AT&T LOCAL	SGNWMIFAXMD
989-561	BLANCHARD	BLANCHARD TELEPHONE ASSOCIATION, INC.	BLNCMIXIDS0
231-486	TRAVERSECY	BROOKS FIBER COMMUNICATIONS	TRCYMIWTDS0
616-524	GRATTAN	BROOKS FIBER COMMUNICATIONS	GDRQMIBODS0
231-898	CARR	CARR TELEPHONE CO.	CARRMIXADS0
231-215	MUSKEGON	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
231-301	HART	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
231-282	GRANT	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
231-286	MUSKEGON	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
231-557	MUSKEGON	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
231-670	MUSKEGON	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
231-740	MUSKEGON	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM9
616-302	GREENVILLE	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
616-402	GRANDHAVEN	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
616-502	GRANDHAVEN	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	GDRPMIBLCM8
989-430	MIDLAND	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	SGNWMIFACM1
989-600	MIDLAND	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	SGNWMIFACM1
989-859	MIDLAND	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	SGNWMIFACM1
231-250	BIG RAPIDS	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	GDRPMINSCM0
231-349	BIG RAPIDS	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	GDRPMINSCM0
231-519	NEWAYGO	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	GDRPMINSCM0
231-679	BIG RAPIDS	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	GDRPMINSCM0
231-742	HART	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	GDRPMINSCM0
989-289	MTPLEASANT	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	MSKGMIAACM1
989-304	EDMORE	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	BYCYMIBNCM0
989-309	REMUS	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	BYCYMIBNCM0
989-330	MTPLEASANT	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	BYCYMIBNCM0
989-506	MTPLEASANT	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	BYCYMIBNCM0
989-763	ITHACA	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	BYCYMIBN2MD
989-944	MTPLEASANT	CELLULAR MOBILE SYS OF MI RSA NO. 7 LIMITED PRTR	BYCYMIBNCM0
231-330	PETOSKEY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-340	ELMIRA	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-342	TRAVERSECY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-350	BELLAIRE	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-357	TRAVERSECY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-383	BEULAH	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-394	MOORESTOWN	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	GDRPMINSCM0
231-492	TRAVERSECY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-499	TRAVERSECY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-590	TRAVERSECY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-631	TRAVERSECY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-649	TRAVERSECY	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0

231-690	LUDINGTON	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	MSKGMIAACCM1
231-878	CADILLAC	CELLULAR NORTH MICHIGAN NETWORK GENERAL PARTNEI	TRCYMICQCM0
231-307	MORLEY	CENTENNIAL MICHIANA LICENSE COMPANY LLC	BTCKMIDECM1
231-335	FREMONT	CENTENNIAL MICHIANA LICENSE COMPANY LLC	BTCKMIDECM1
231-408	BIG RAPIDS	CENTENNIAL MICHIANA LICENSE COMPANY LLC	BTCKMIDECM1
231-465	REED CITY	CENTENNIAL MICHIANA LICENSE COMPANY LLC	BTCKMIDECM1
231-598	BIG RAPIDS	CENTENNIAL MICHIANA LICENSE COMPANY LLC	BTCKMIDECM1
616-263	CEDAR SPG	CENTENNIAL MICHIANA LICENSE COMPANY LLC	BTCKMIDECM1
616-548	GREENVILLE	CENTENNIAL MICHIANA LICENSE COMPANY LLC	BTCKMIDECM1
989-310	EAST TAWAS	CENTENNIAL MICHIANA LICENSE COMPANY LLC	SGNWMIFAX4X
989-312	WESTBRANCH	CENTENNIAL MICHIANA LICENSE COMPANY LLC	SGNWMIFAX4X
989-314	STANDISH	CENTENNIAL MICHIANA LICENSE COMPANY LLC	SGNWMIFAX4X
989-444	MTPLEASANT	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-503	HIGGINS LK	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-510	PRESCOTT	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-514	STERLING	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-520	ALGER	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-538	HOUGHTONLK	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-560	MTPLEASANT	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-565	EDMORE	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-576	ALMA	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-601	ITHACA	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-613	SHERIDAN	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-690	HUBBARDSTN	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-801	BRECKENRDG	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-807	VESTABURG	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-814	SIX LAKES	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-818	LAKEVIEW	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-857	REMUS	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-934	ROSE CITY	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-943	MIDDLETON	CENTENNIAL MICHIANA LICENSE COMPANY LLC	MNPLMIAI1MD
989-329	GLADWIN	CENTURY CELLUNET OF MI RSA #6 CELLULAR LTD PRTR	BYCYMIBNCM0
989-339	FARWELL	CENTURY CELLUNET OF MI RSA #6 CELLULAR LTD PRTR	BYCYMIBNCM0
989-387	GLADWIN	CENTURY CELLUNET OF MI RSA #6 CELLULAR LTD PRTR	BYCYMIBNCM0
989-965	GLADWIN	CENTURY CELLUNET OF MI RSA #6 CELLULAR LTD PRTR	BYCYMIBNCM0
231-420	CHEBOYGAN	CENTURY CELLUNET OF MICHIGAN RSA #4, INC.	TRCYMICQCM0
989-370	ALPENA	CENTURY CELLUNET OF MICHIGAN RSA #4, INC.	ALPEMIAHCM2
989-390	GRAYLING	CENTURY CELLUNET OF MICHIGAN RSA #4, INC.	GRYLMIAU1MD
989-464	ALPENA	CENTURY CELLUNET OF MICHIGAN RSA #4, INC.	ALPEMIAHCM2
989-619	ALPENA	CENTURY CELLUNET OF MICHIGAN RSA #4, INC.	ALPEMIAHCM2
989-513	MIDLAND	CENTURY CELLUNET OF SAGINAW MSA LIMITED PARTNRSH	BYCYMIBNCM0
231-329	MUSKEGON	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	MSKGMIAACCM1
231-384	KALKASKA	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	TRCYMICQCM0
231-388	LE ROY	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	GDRPMINSCM0
231-730	MUSKEGON	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	MSKGMIAACCM1
231-750	MUSKEGON	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	MSKGMIAACCM1
616-799	CEDAR SPG	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	GDRPMINSCM0
616-894	GREENVILLE	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	GDRPMINSCM0
989-287	LAKEVIEW	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	BYCYMIBN2MD
989-305	EAST TAWAS	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	BYCYMIBNCM0
989-306	ONAWAY	CENTURY CELLUNET OF SOUTHERN MI CELLULAR LTD PRTR	ALPEMIAHCM2
231-867	CHIPPEWALK	CENTURY TELEPHONE - MIDWEST, INC.	CHLKMIXIDS0
231-972	MECOSTA	CENTURY TELEPHONE - MIDWEST, INC.	MCSTMIXIDS0
989-653	OMER	CENTURY TELEPHONE - MIDWEST, INC.	OMERMIXJRS0
989-876	AUGRES	CENTURY TELEPHONE - MIDWEST, INC.	AUGRMIXJDS0
231-263	KINGSLEY	CENTURY TELEPHONE CO. OF NORTHERN MICHIGAN	KGSLMIXIDS0
231-826	FALMOUTH	CENTURY TELEPHONE CO. OF NORTHERN MICHIGAN	FLMOMIXIDS0
231-228	GLEN LAKE	CENTURY TELEPHONE OF MICHIGAN, INC.	CEDRMIXIDS0

231-229	MOORESTOWN	CENTURY TELEPHONE OF MICHIGAN, INC.	MSTWMIXIDS0
231-271	SUTTONSBAY	CENTURY TELEPHONE OF MICHIGAN, INC.	STBYMIXIRS1
231-275	LAKE ANN	CENTURY TELEPHONE OF MICHIGAN, INC.	LKANMIXIDS0
231-325	HONOR	CENTURY TELEPHONE OF MICHIGAN, INC.	HNORMIXIRS1
231-326	GLEN LAKE	CENTURY TELEPHONE OF MICHIGAN, INC.	EMPRMIXIRSA
231-328	MERRITT	CENTURY TELEPHONE OF MICHIGAN, INC.	MRRTMIXIDS0
231-334	GLEN LAKE	CENTURY TELEPHONE OF MICHIGAN, INC.	GLARMIXIDS0
231-529	BRUTUS	CENTURY TELEPHONE OF MICHIGAN, INC.	BRTSMIXIDS0
231-537	LEVERING	CENTURY TELEPHONE OF MICHIGAN, INC.	LVRGMIXIDS1
231-546	ELMIRA	CENTURY TELEPHONE OF MICHIGAN, INC.	EMIRMIXJDS0
231-548	ALANSON	CENTURY TELEPHONE OF MICHIGAN, INC.	ALNSMIXJDS0
231-549	BOYNEFALLS	CENTURY TELEPHONE OF MICHIGAN, INC.	BNFLMIXIDS0
231-839	LAKE CITY	CENTURY TELEPHONE OF MICHIGAN, INC.	LKCYMIXIDS1
231-864	BEAR LAKE	CENTURY TELEPHONE OF MICHIGAN, INC.	BLKCMIXIDS0
989-235	CRYSTAL	CENTURY TELEPHONE OF MICHIGAN, INC.	CRYSMIXIDS0
989-261	VICKERYVL	CENTURY TELEPHONE OF MICHIGAN, INC.	VCVLMIXIRS0
989-469	SANDLK HTS	CENTURY TELEPHONE OF MICHIGAN, INC.	SLKHMIXIRS0
989-689	HOPE	CENTURY TELEPHONE OF MICHIGAN, INC.	HOPEMIXIDS1
989-728	HALE	CENTURY TELEPHONE OF MICHIGAN, INC.	HALEMIXADS1
989-735	GLENNIE	CENTURY TELEPHONE OF MICHIGAN, INC.	GLNEMIXIRS0
989-756	WHITTEMORE	CENTURY TELEPHONE OF MICHIGAN, INC.	WHMRMIXIRS0
231-287	BIG RAPIDS	CENTURYTEL WIRELESS, INC.	GDPRMINSCM0
231-327	MUSKEGON	CENTURYTEL WIRELESS, INC.	MSKGMIAACCM1
231-429	CADILLAC	CENTURYTEL WIRELESS, INC.	TRCYMICQCM0
231-714	TRAVERSECY	CENTURYTEL WIRELESS, INC.	TRCYMICOCM0
989-578	GLADWIN	CENTURYTEL WIRELESS, INC.	BYCYMIBNCM0
989-590	ALPENA	CENTURYTEL WIRELESS, INC.	ALPEMIAHCM2
989-824	MTPLEASANT	CENTURYTEL WIRELESS, INC.	BYCYMIBNCM0
989-267	VESTABURG	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-290	SHERIDAN	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-346	GRAYLING	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-353	LAKEVIEW	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-355	ALPENA	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-423	HOUGHTONLK	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-468	ALMA	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-645	WEIDMAN	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-655	STERLING	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-680	ROSE CITY	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-706	GAYLORD	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-713	HARRISVL	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-740	ROGERSCTY	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-778	MTPLEASANT	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-819	HIGGINS LK	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-840	MIO	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-844	BRECKENRDG	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
989-877	ITHACA	DAYSTARR, LLC DBA DAYSTARR COMMUNICATIONS	CRNNMIA S00W
231-313	TRAVERSECY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-409	TRAVERSECY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-432	NORTHPORT	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-510	MANISTEE	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-564	KALKASKA	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-570	FIFE LAKE	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-613	SCOTTVILLE	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-620	TRAVERSECY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-632	TRAVERSECY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-633	TRAVERSECY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-640	LAKE ANN	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1
231-645	TRAVERSECY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICM1

231-651	BEULAH	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-667	MARION	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-673	BOYNE CITY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-676	BELLAIRE	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-709	TRAVERSECY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-729	IRONS	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-794	MANISTEE	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-835	GLEN LAKE	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-838	PETOSKEY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-866	SUTTONSBAY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-907	LUDINGTON	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-912	REED CITY	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-920	CADILLAC	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
231-970	BEAR LAKE	DOBSON CELLULAR SYSTEMS, INC.	TRCYMICICMI
989-718	STANDISH	F	SGNWMIDFXMD
231-222	EASTJORDAN	ICG TELECOM GROUP	GDRPMIBLX5Z
231-225	FREMONT	ICG TELECOM GROUP	GDRPMIBLX5Z
231-333	CHEBOYGAN	ICG TELECOM GROUP	GDRPMIBLX5Z
231-480	LUDINGTON	ICG TELECOM GROUP - MI	GDRPMIBLX5Z
616-607	GRANDHAVEN	ICG TELECOM GROUP - MI	GDRPMIBLX5Z
989-285	ALMA	ICG TELECOM GROUP - MI	SGNWMIECX9X
231-634	BOIS BLANC	ISLAND TELEPHONE CO.	BBISMIXIDS0
231-362	KALEVA	KALEVA TELEPHONE CO.	KLVMIXIDS0
231-477	BRETHREN	KALEVA TELEPHONE CO.	BRTHMIXIRSA
231-859	DUBLIN	KALEVA TELEPHONE CO.	DBLNMXIRS0
231-421	TRAVERSECY	KMC TELECOM III, INC.	TRCYMIAMXMD
231-457	MUSKEGON	KMC TELECOM III, INC.	MSKGMIBGXMD
231-674	GRANT	KMC TELECOM III, INC.	HLLDMIGW00W
231-681	FRUITPORT	KMC TELECOM III, INC.	MSKGMIBGXMD
231-791	REED CITY	KMC TELECOM III, INC.	HLLDMIGW00W
231-803	MORLEY	KMC TELECOM III, INC.	HLLDMIGW00W
231-923	HART	KMC TELECOM III, INC.	MSKGMIBGXMD
989-486	MIDLAND	KMC TELECOM III, INC.	MDLDMICBXMD
989-948	MIDLAND	KMC TELECOM III, INC.	SGNWMIDFXMD
989-202	HOUGHTONLK	KMC TELECOM V, INC.	ALMAMIXGXMD
989-675	SIDNEY	KMC TELECOM V, INC.	ALMAMIXGXMD
989-745	GRAYLING	KMC TELECOM V, INC.	ALMAMIXGXMD
989-760	ALMA	KMC TELECOM V, INC.	ALMAMIXGXMD
989-783	ROSCOMMON	KMC TELECOM V, INC.	ALMAMIXGXMD
989-813	HUBBARDSTN	KMC TELECOM V, INC.	ALMAMIXGXMD
989-817	MTPLEASANT	KMC TELECOM V, INC.	ALMAMIXGXMD
989-966	VANDERBILT	KMC TELECOM V, INC.	ALMAMIXGXMD
231-518	KALKASKA	KMC TELECOM V, INC.	HLLDMIGW00W
231-646	ELLSWORTH	KMC TELECOM V, INC.	HLLDMIGW00W
231-735	TRAVERSECY	KMC TELECOM V, INC.	HLLDMIGW00W
231-753	PETOSKEY	KMC TELECOM V, INC.	HLLDMIGW00W
231-790	FREESOIL	KMC TELECOM V, INC.	HLLDMIGW00W
231-844	INDIAN RIV	KMC TELECOM V, INC.	HLLDMIGW00W
231-916	MANCERLONA	KMC TELECOM V, INC.	HLLDMIGW00W
231-930	BEULAH	KMC TELECOM V, INC.	HLLDMIGW00W
231-936	SCOTTVILLE	KMC TELECOM V, INC.	HLLDMIGW00W
231-942	CADILLAC	KMC TELECOM V, INC.	HLLDMIGW00W
616-557	SAND LAKE	KMC TELECOM V, INC.	HLLDMIGW00W
989-569	OSCODA	KMC TELECOM V, INC.	SGNWMIDFXMD
989-632	ST HELEN	KMC TELECOM V, INC.	SGNWMIDFXMD
989-884	ALPENA	KMC TELECOM V, INC.	ALPEMIXGXMD
231-366	FRUITPORT	LEVEL 3 COMMUNICATIONS, LLC	GDRPMIQLX1Y
231-577	CADILLAC	LEVEL 3 COMMUNICATIONS, LLC	GDRPMIQLX1Y

231-622	PETOSKEY	LEVEL 3 COMMUNICATIONS, LLC	GDRPMIQLX1Y
231-668	TRAVERSECY	LEVEL 3 COMMUNICATIONS, LLC	GDRPMIQLX1Y
231-680	REED CITY	LEVEL 3 COMMUNICATIONS, LLC	GDRPMIQLX1Y
231-903	MUSKEGON	LEVEL 3 COMMUNICATIONS, LLC	GDRPMIQLX1Y
989-448	GAYLORD	LEVEL 3 COMMUNICATIONS, LLC	SGNWMIECX8X
989-488	MIDLAND	LEVEL 3 COMMUNICATIONS, LLC	SGNWMIECX8X
989-546	MTPLEASANT	LEVEL 3 COMMUNICATIONS, LLC	SGNWMIECX8X
989-726	WESTBRANCH	LEVEL 3 COMMUNICATIONS, LLC	SGNWMIECX8X
989-796	ALMA	LEVEL 3 COMMUNICATIONS, LLC	SGNWMIECX8X
231-220	MUSKEGON	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-441	FIFE LAKE	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-438	MANISTEE	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-520	CHARLEVOIX	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-538	FREMONT	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-533	LUDINGTON	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-635	MACKINAWCY	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-636	HOWARD CITY	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-639	BEULAH	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-643	MORLEY	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-656	KALKASKA	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-660	BIG RAPIDS	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-656	FRANKFORT	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-721	HART	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-776	PETOSKEY	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-778	TRAVERSECY	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-782	CHEBOYGAN	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-792	MANCERLONA	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-806	CORAL	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-808	CENTRAL LK	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-836	EVART	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-842	CADILLAC	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-874	WOLVERINE	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-899	NORTHPORT	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-908	MCBAIN	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-925	SCOTTVILLE	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
231-974	GRANT	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	GDRPMIBLX8Z
989-278	ALPENA	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	SGNWMIFAZMD
989-281	ROSCOMMON	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	SGNWMIFAZMD
989-283	STANTON	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	SGNWMIFAZMD
989-374	MIDLAND	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	SGNWMIFAZMD
989-437	STANDISH	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	SGNWMIFAZMD
989-861	OSCODA	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	SGNWMIFAZMD
989-896	WESTBRANCH	LOCAL EXCHANGE CARRIERS OF MICHIGAN, INC	SGNWMIFAZMD
231-224	FREMONT	LUCRE, INC.	GDRPMIIV1MD
231-249	CHEBOYGAN	LUCRE, INC.	GDRPMIIV1MD
231-302	PETOSKEY	LUCRE, INC.	GDRPMIIV1MD
231-323	EASTJORDAN	LUCRE, INC.	GDRPMIIV1MD
231-337	MCBAIN	LUCRE, INC.	GDRPMIIV1MD
231-345	REED CITY	LUCRE, INC.	GDRPMIIV1MD
231-423	EVART	LUCRE, INC.	GDRPMIIV1MD
231-435	CADILLAC	LUCRE, INC.	GDRPMIIV1MD
231-438	MANISTEE	LUCRE, INC.	GDRPMIIV1MD
231-452	NEWAYGO	LUCRE, INC.	GDRPMIIV1MD
231-460	BIG RAPIDS	LUCRE, INC.	GDRPMIIV1MD
231-482	BOYNE CITY	LUCRE, INC.	GDRPMIIV1MD
231-522	LUTHER	LUCRE, INC.	GDRPMIIV1MD
231-543	LE ROY	LUCRE, INC.	GDRPMIIV1MD
231-556	CHARLEVOIX	LUCRE, INC.	GDRPMIIV1MD

231-563	MUSKEGON	LUCRE, INC.	GDRPMIIV1MD
231-568	TRAVERSECY	LUCRE, INC.	GDRPMIIV1MD
231-594	HART	LUCRE, INC.	GDRPMIIV1MD
231-614	PENTWATER	LUCRE, INC.	GDRPMIIV1MD
231-623	WOLVERINE	LUCRE, INC.	GDRPMIIV1MD
231-644	BRETHREN	LUCRE, INC.	GDRPMIIV1MD
231-648	HOWARDCITY	LUCRE, INC.	GDRPMIIV1MD
231-662	DUBLIN	LUCRE, INC.	GDRPMIIV1MD
231-693	INDIAN RIV	LUCRE, INC.	GDRPMIIV1MD
231-694	BEULAH	LUCRE, INC.	GDRPMIIV1MD
231-697	BELLAIRE	LUCRE, INC.	GDRPMIIV1MD
231-698	HARRIETTA	LUCRE, INC.	GDRPMIIV1MD
231-731	SHELBY	LUCRE, INC.	GDRPMIIV1MD
231-732	MORLEY	LUCRE, INC.	GDRPMIIV1MD
231-754	MANCELONA	LUCRE, INC.	GDRPMIIV1MD
231-789	FRANKFORT	LUCRE, INC.	GDRPMIIV1MD
231-793	WHITECLOUD	LUCRE, INC.	GDRPMIIV1MD
231-813	LUDINGTON	LUCRE, INC.	GDRPMIIV1MD
231-827	FIFE LAKE	LUCRE, INC.	GDRPMIIV1MD
231-863	SCOTTVILLE	LUCRE, INC.	GDRPMIIV1MD
231-875	FRUITPORT	LUCRE, INC.	GDRPMIIV1MD
231-877	NORTHPORT	LUCRE, INC.	GDRPMIIV1MD
231-896	CORAL	LUCRE, INC.	GDRPMIIV1MD
231-926	KALKASKA	LUCRE, INC.	GDRPMIIV1MD
231-962	KALEVA	LUCRE, INC.	GDRPMIIV1MD
616-223	GRANDHAVEN	LUCRE, INC.	GDRPMIIV1MD
616-347	SAND LAKE	LUCRE, INC.	GDRPMIIV1MD
616-515	CASNOVIA	LUCRE, INC.	GDRPMIIV1MD
616-712	GREENVILLE	LUCRE, INC.	GDRPMIIV1MD
616-918	CEDAR SPG	LUCRE, INC.	GDRPMIIV1MD
231-206	MUSKEGON	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-218	TRAVERSECY	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-425	LUDINGTON	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-437	CHARLEVOIX	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-578	MUSKEGON	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-624	KALKASKA	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-629	BIG RAPIDS	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-638	MUSKEGON	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-642	TRAVERSECY	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-758	PETOSKEY	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
231-846	CADILLAC	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
616-638	GRANDHAVEN	NEXTEL COMMUNICATIONS	GDRQMIIY0MD
989-205	MIDLAND	NEXTEL COMMUNICATIONS	SGNWMIDFYMD
989-302	HOUGHTONLK	NEXTEL COMMUNICATIONS	ALMAMIXG2MD
989-429	HARRISON	NEXTEL COMMUNICATIONS	SGNWMIDFYMD
989-614	GAYLORD	NEXTEL COMMUNICATIONS	ALMAMIXG2MD
989-615	MIDLAND	NEXTEL COMMUNICATIONS	SGNWMIDFYMD
989-620	ALMA	NEXTEL COMMUNICATIONS	SGNWMIDFYMD
989-621	MTPLEASANT	NEXTEL COMMUNICATIONS	SGNWMIDFYMD
989-710	GRAYLING	NEXTEL COMMUNICATIONS	ALMAMIXG2MD
989-942	WESTBRANCH	NEXTEL COMMUNICATIONS	SGNWMIDFYMD
231-360	TRAVERSECY	NPI-OMNIPOINT WIRELESS, LLC	TRCYMIIDCM0
231-414	NEWAYGO	NPI-OMNIPOINT WIRELESS, LLC	TRCYMIIDCM0
231-715	TRAVERSECY	NPI-OMNIPOINT WIRELESS, LLC	TRCYMIIDCM0
231-818	CHEBOYGAN	NPI-OMNIPOINT WIRELESS, LLC	TRCYMIIDCM0
231-852	LUDINGTON	NPI-OMNIPOINT WIRELESS, LLC	MSKGMIFX1MD
231-855	MUSKEGON	NPI-OMNIPOINT WIRELESS, LLC	MSKGMIFX1MD
231-871	BEULAH	NPI-OMNIPOINT WIRELESS, LLC	TRCYMIIDCM0

231-872	REED CITY	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
231-881	PETOSKEY	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
231-883	TRAVERSECY	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
231-884	CADILLAC	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
231-886	KALKASKA	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
231-887	MANISTEE	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
231-955	MUSKEGON	NPI-OMNIPPOINT WIRELESS, LLC	MSKGMIFX1MD
616-824	GREENVILLE	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
616-843	GRANDHAVEN	NPI-OMNIPPOINT WIRELESS, LLC	TRCYMIIDCM0
989-701	WESTBRANCH	NPI-OMNIPPOINT WIRELESS, LLC	SGNWMIECXYY
989-808	ROSCOMMON	NPI-OMNIPPOINT WIRELESS, LLC	MNPLMICP1MD
989-820	EAST TAWAS	NPI-OMNIPPOINT WIRELESS, LLC	SGNWMIECXYY
989-854	MTPLEASANT	NPI-OMNIPPOINT WIRELESS, LLC	MNPLMICP1MD
989-858	GAYLORD	NPI-OMNIPPOINT WIRELESS, LLC	MNPLMICP1MD
989-889	GRAYLING	NPI-OMNIPPOINT WIRELESS, LLC	MNPLMICP1MD
989-903	STANDISH	NPI-OMNIPPOINT WIRELESS, LLC	SGNWMIECXYY
989-916	ALPENA	NPI-OMNIPPOINT WIRELESS, LLC	MNPLMICP1MD
989-954	MTPLEASANT	NPI-OMNIPPOINT WIRELESS, LLC	MNPLMICP1MD
231-223	OLDMISSION	PENTINSULA TELEPHONE CO.	OLMSMIXIDS0
989-215	OSCODA	PHONE MICHIGAN	SGNWMIFA7MD
989-216	WESTBRANCH	PHONE MICHIGAN	SGNWMIFA7MD
989-462	ALMA	PHONE MICHIGAN	SGNWMIFA7MD
989-572	MTPLEASANT	PHONE MICHIGAN	SGNWMIFA7MD
989-698	MIDLAND	PHONE MICHIGAN	SGNWMIFA7MD
989-923	MIDLAND	PHONE MICHIGAN	SGNWMIFA7MD
989-946	STANDISH	PHONE MICHIGAN	SGNWMIFA7MD
231-584	ALBA	PIGEON TELEPHONE CO.	ALBAMIXJRS0
989-867	TWINING	PIGEON TELEPHONE CO.	TWNGMI01DS0
231-290	INDIAN RIV	R.F.B. CELLULAR, INC.	ELTPMIAACM0
989-350	GAYLORD	R.F.B. CELLULAR, INC.	GYLRMIAC1MD
989-351	ROGERS CITY	R.F.B. CELLULAR, INC.	RGCYMIAH0MD
989-357	ALPENA	R.F.B. CELLULAR, INC.	ALPEMICO0MD
989-481	BRECKENRDG	SPRINT COMMUNICATIONS COMPANY, L.P.	ALMAMIXGSMD
989-533	ALMA	SPRINT COMMUNICATIONS COMPANY, L.P.	ALMAMIXGSMD
989-567	SHEPHERD	SPRINT COMMUNICATIONS COMPANY, L.P.	ALMAMIXGSMD
231-463	TRAVERSECY	SPRINT COMMUNICATIONS COMPANY, L.P.	GDRPMIBLXSY
231-633	MUSKEGON	SPRINT COMMUNICATIONS COMPANY, L.P.	GDRPMIBLXSY
989-941	MIDLAND	SPRINT COMMUNICATIONS COMPANY, L.P.	SGNWMIFJSMD
231-343	MUSKEGON	SPRINT SPECTRUM L.P.	KNWDMIJDCM0
231-392	TRAVERSECY	SPRINT SPECTRUM L.P.	KNWDMIJDCM0
231-468	CADILLAC	SPRINT SPECTRUM L.P.	KNWDMIJDCM0
231-530	BIG RAPIDS	SPRINT SPECTRUM L.P.	KNWDMIJDCM0
989-400	MTPLEASANT	SPRINT SPECTRUM L.P.	ASHYMIAE0MD
989-703	MIDLAND	SPRINT SPECTRUM L.P.	SGNWMIEC0MD
989-915	GRAYLING	SPRINT SPECTRUM L.P.	ASHYMIAE0MD
616-935	GRANDHAVEN	TDS METROCOM INC.	WYNGMIKEDS0
231-305	BIG RAPIDS	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-306	CADILLAC	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-308	CHARLEVOIX	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-309	MANISTEE	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-312	FRANKFORT	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-314	KALKASKA	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-316	LUDINGTON	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-319	MACKINAWCY	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-332	MUSKEGON	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-344	PETOSKEY	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-346	TRAVERSECY	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-351	SCOTTVILLE	TELNET WORLDWIDE, INC.	GDRQMIFOCA0

231-353	MCBAIN	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-355	FREMONT	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-356	MANCELONA	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-358	CENTRAL LK	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-361	MORLEY	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-363	CHEBOYGAN	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-365	WOLVERINE	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-372	EVART	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-395	GRANT	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-637	NORTHPORT	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-647	CORAL	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-682	ALDEN	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-695	HOWARDCITY	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-764	FIFE LAKE	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-822	BEULAH	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
231-902	HART	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
616-619	GREENVILLE	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
616-829	CEDAR SPG	TELNET WORLDWIDE, INC.	GDRQMIFOCA0
989-243	ATLANTA	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-333	FAIRVIEW	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-336	ITHACA	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-337	WEIDMAN	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-347	GLADWIN	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-357	WESTBRANCH	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-419	ALPENA	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-507	ROSE CITY	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-512	STANDISH	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-516	WESTBRANCH	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-521	ROGERS CITY	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-524	STERLING	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-540	LAKEVIEW	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-542	FENWICK	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-563	ROSCOMMON	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-622	HUBBARDSTN	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-629	ALMA	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-649	REMUS	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-676	PRESCOTT	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-688	GAYLORD	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-764	OSCODA	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-782	LUPTON	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-794	MIDLAND	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-806	STANTON	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-825	ALGER	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-905	CARSONCITY	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-910	HOUGHTON LK	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-949	MCBRIDES	TELNET WORLDWIDE, INC.	SGNWMIACCA0
989-956	MTPLEASANT	TELNET WORLDWIDE, INC.	SGNWMIACCA0
231-762	AMBLE	UPPER PENINSULA TELEPHONE CO.	AMBLMIXJDS0
989-925	MANISTE RV	UPPER PENINSULA TELEPHONE CO.	MRVRMIXIDS0
616-604	GRANDHAVEN	US XCHANGE OF MICHIGAN LLC DBA CHOICE ONE COMM MI	PRTGMI01DS0
231-331	ALDEN	VERIZON NORTH INC.	ALDNMIXHRS0
231-320	MUSKEGON	VERIZON NORTH INC.	MSKGMIBGCM1
231-322	TRCHRVBDG	VERIZON NORTH INC.	TRRV MIXGRS0
989-463	ALMA	VERIZON NORTH INC.	ALMAMIXGDS0
989-466	ALMA	VERIZON NORTH INC.	ALMAMIXGDS0
989-836	ALGER	VERIZON NORTH INC.	ALGRMIXJDS0
231-377	CLAM RIVER	VERIZON NORTH INC.	CLRV MIXHRS0
231-533	BELLAIRE	VERIZON NORTH INC.	BLLRMIXGDS0

231-544	CENTRAL LK	VERIZON NORTH INC.	CNLKMIXGRS0
231-571	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-588	ELLSWORTH	VERIZON NORTH INC.	ELWOMIXHRS0
231-599	EASTPORT	VERIZON NORTH INC.	ESPTMIXGRS0
231-719	MUSKEGON	VERIZON NORTH INC.	MSKGMIXLDS0
231-720	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-722	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-724	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-725	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-726	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-727	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-728	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-733	MUSKEGON	VERIZON NORTH INC.	MSKHMIXPDS0
231-736	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-737	MUSKEGON	VERIZON NORTH INC.	MSKHMIXPDS0
231-739	MUSKEGON	VERIZON NORTH INC.	MSKHMIXPDS0
231-744	MUSKEGON	VERIZON NORTH INC.	MSKGMIXLDS0
231-747	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-755	MUSKEGON	VERIZON NORTH INC.	MSKGMIXRDS0
231-759	MUSKEGON	VERIZON NORTH INC.	MSKGMIXRDS0
231-760	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-766	MUSKEGON	VERIZON NORTH INC.	MSKGMIXQRS0
231-767	MUSKEGON	VERIZON NORTH INC.	MSKGMIXNDS0
231-769	MUSKEGON	VERIZON NORTH INC.	MSKGMIXKDS1
231-773	MUSKEGON	VERIZON NORTH INC.	MSKGMIXNDS0
231-777	MUSKEGON	VERIZON NORTH INC.	MSKGMIXNDS0
231-780	MUSKEGON	VERIZON NORTH INC.	NRSHMIXGRS0
231-788	MUSKEGON	VERIZON NORTH INC.	WLKMMIXGRS0
231-798	MUSKEGON	VERIZON NORTH INC.	MSKGMIXMRS0
231-799	MUSKEGON	VERIZON NORTH INC.	MSKGMIXMRS0
231-821	HOLTON	VERIZON NORTH INC.	HLTNMIXGRS0
231-823	STANWOOD	VERIZON NORTH INC.	STWDMIXGRS0
231-828	TWIN LAKE	VERIZON NORTH INC.	TNLKMIXGRS0
231-830	MUSKEGON	VERIZON NORTH INC.	MSKHMIXPDS0
231-843	LUDINGTON	VERIZON NORTH INC.	LDNGMIXGDS0
231-845	LUDINGTON	VERIZON NORTH INC.	LDNGMIXGDS0
231-853	RAVENNA	VERIZON NORTH INC.	RVNNMIXGRS0
231-854	HESPERIA	VERIZON NORTH INC.	HSPRMIXHRS0
231-861	SHELBY	VERIZON NORTH INC.	SHLBMIXGRS0
231-865	FRUITPORT	VERIZON NORTH INC.	FRPRMIXGRS0
231-869	PENTWATER	VERIZON NORTH INC.	PNTWMIXGRS0
231-873	HART	VERIZON NORTH INC.	HARTMIXGRS0
231-893	WHITEHALL	VERIZON NORTH INC.	WHTHMIXGDS0
231-894	WHITEHALL	VERIZON NORTH INC.	WHTHMIXGDS0
231-937	HOWARD CITY	VERIZON NORTH INC.	HWCYMIXGDS0
231-981	WHITEHALL	VERIZON NORTH INC.	WHTHMIXGDS0
989-236	MIDDLETON	VERIZON NORTH INC.	MDTNMIXGRS0
989-268	VESTABURG	VERIZON NORTH INC.	VTBGMIXGRS0
989-275	ROSCOMMON	VERIZON NORTH INC.	RSCMMIXGRS0
989-291	SHERIDAN	VERIZON NORTH INC.	SHRDMIXGRS0
989-328	SIDNEY	VERIZON NORTH INC.	SDNYMIXGRS0
989-344	GRAYLING	VERIZON NORTH INC.	GRYLMIXGDS0
989-348	GRAYLING	VERIZON NORTH INC.	GRYLMIXGDS0
989-352	LAKEVIEW	VERIZON NORTH INC.	LKVWMIXGRS0
989-354	ALPENA	VERIZON NORTH INC.	ALPEMIXGDS0
989-356	ALPENA	VERIZON NORTH INC.	ALPEMIXGDS0
989-358	ALPENA	VERIZON NORTH INC.	ALPEMIXGDS0
989-365	SIX LAKES	VERIZON NORTH INC.	SXLKMIXGRS0

989-366	HOUGHTONLK	VERIZON NORTH INC.	PDVLMIXMRS0
989-379	LACHNE	VERIZON NORTH INC.	LCHNMIXGRS0
989-422	HOUGHTONLK	VERIZON NORTH INC.	HGPTMIXLRS0
989-427	EDMORE	VERIZON NORTH INC.	EDMRMIXGDS0
989-471	OSSINEKE	VERIZON NORTH INC.	OSNMIXGDS0
989-584	CARSONCITY	VERIZON NORTH INC.	CRCYMIXGRS0
989-595	LONG LAKE	VERIZON NORTH INC.	LLALMIXGRS0
989-644	WEIDMAN	VERIZON NORTH INC.	WDMNMIXGRS0
989-681	ST LOUIS	VERIZON NORTH INC.	STLSMIXGRS0
989-705	GAYLORD	VERIZON NORTH INC.	GYLRMIXGDS0
989-724	HARRISVL	VERIZON NORTH INC.	HRVLMIXGRS0
989-727	HUBBARD LK	VERIZON NORTH INC.	HBLKMIXGRS0
989-731	GAYLORD	VERIZON NORTH INC.	GYLRMIXGDS0
989-732	GAYLORD	VERIZON NORTH INC.	GYLRMIXGDS0
989-733	ONAWAY	VERIZON NORTH INC.	ONWYMIXGRS0
989-734	ROGERS CITY	VERIZON NORTH INC.	RGCYMIXGDS0
989-742	HILLMAN	VERIZON NORTH INC.	HLNMIXGRS0
989-762	MCBRIDES	VERIZON NORTH INC.	MCBRMIXGRS0
989-766	POSEN	VERIZON NORTH INC.	POSNMIXGRS0
989-772	MTPLEASANT	VERIZON NORTH INC.	MNPLMIXGDS0
989-773	MTPLEASANT	VERIZON NORTH INC.	MNPLMIXGDS0
989-774	MTPLEASANT	VERIZON NORTH INC.	MNPLMIXGDS0
989-775	MTPLEASANT	VERIZON NORTH INC.	MNPLMIXGDS0
989-779	MTPLEASANT	VERIZON NORTH INC.	MNPLMIXGDS0
989-785	ATLANTA	VERIZON NORTH INC.	ATLNMIXGRS0
989-786	LEWISTON	VERIZON NORTH INC.	LSTNMIXGRS0
989-821	HIGGINS LK	VERIZON NORTH INC.	HGLKMIXGRS0
989-826	MIO	VERIZON NORTH INC.	MIO MIXGDS0
989-828	SHEPHERD	VERIZON NORTH INC.	SHPHMIXGRS0
989-831	STANTON	VERIZON NORTH INC.	SNTNMIXGRS0
989-833	RIVERDALE	VERIZON NORTH INC.	RVDL MIXGRS0
989-842	BRECKENRDG	VERIZON NORTH INC.	BRRGMIXGRS0
989-848	FAIRVIEW	VERIZON NORTH INC.	FRVWMIXGDS0
989-875	ITHACA	VERIZON NORTH INC.	ITHCMIXGRS0
989-967	REMUS	VERIZON NORTH INC.	RMUSMIXGRS0
989-981	HUBBARDSTN	VERIZON NORTH INC.	HBTNMIXGRS0
989-983	VANDERBILT	VERIZON NORTH INC.	VNDRMIXGRS0
989-473	LUPTON	VERIZON NORTH INC.	LPTNMIXJDS0
989-654	STERLING	VERIZON NORTH INC.	STNGMIXJDS0
989-655	ROSE CITY	VERIZON NORTH INC.	RSCYMIXJDS0
989-873	PRESCOTT	VERIZON NORTH INC.	PRSCMIXPDS1
989-866	WINN	WINN TELEPHONE CO.	WINNMIXIDS0
989-449	ITHACA	WINN TELEPHONE COMPANY DBA WINN TELECOM	MNPLMICFDS0
989-953	MTPLEASANT	WINN TELEPHONE COMPANY DBA WINN TELECOM	MNPLMICFDS0
989-968	ALMA	WINN TELEPHONE COMPANY DBA WINN TELECOM	MNPLMICFDS0
989-687	SANFORD	WOLVERINE TELEPHONE CO.	SNFRMIXIDS1

EXHIBIT B

**AUGUST 26, 2003 ORDER GRANTING NPI'S APPLICATION FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)	
NPI-OMNIPPOINT WIRELESS, LLC,)	
for designation as an eligible telecommunications)	Case No. U-13714
carrier pursuant to Section 214(e)(6) of the)	
Communications Act of 1934.)	
_____)	

At the August 26, 2003 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. J. Peter Lark, Chair
Hon. Robert B. Nelson, Commissioner
Hon. Laura Chappelle, Commissioner

OPINION AND ORDER

I.

HISTORY OF PROCEEDINGS

On March 3, 2003, NPI-Omnipoint Wireless, LLC, (NPI) filed an application seeking designation as an eligible telecommunications carrier (ETC) under Section 214(e)(6) of the federal Communications Act of 1934, as amended, 47 USC 214(e)(6) (federal Act) and Sections 201 and 203 of the Michigan Telecommunications Act, MCL 484.2101 et seq. (MTA). If granted, designation as an ETC would permit NPI to receive universal service support in Michigan.

Several parties petitioned to participate in the proceeding. On May 6, 2003, the Commission Staff (Staff) filed a notice of appearance. On May 21, 2003, CenturyTel of Michigan, Inc., CenturyTel Midwest-Michigan, Inc., CenturyTel of Northern Michigan, Inc., and CenturyTel of

Upper Michigan, Inc., (CenturyTel) jointly filed a petition to intervene. Also on May 21, 2003, Hiawatha Telephone Company, Chippewa County Telephone Company, Midway Telephone Company, and Ontonagon County Telephone Company (Hiawatha) jointly petitioned to intervene. The Michigan Exchange Carriers Association, Inc., (MECA), a voluntary association of 33 small incumbent local exchange carriers (ILECs) in Michigan, also filed a petition. On May 28, 2003, AT&T Communications of Michigan, Inc., and TCG Detroit (AT&T) filed a notice of intent to participate.

On May 28, 2003, a pre-hearing conference was conducted by Administrative Law Judge Mark E. Cummins (ALJ). NPI, CenturyTel, Hiawatha, MECA, AT&T, and the Staff attended. The ALJ ordered the parties to file their direct testimony by June 10, 2003 and rebuttal testimony by June 23, 2003. Cross-examination of witnesses was to take place on July 7, 2003,¹ with a briefing schedule to be determined thereafter. In order to meet the 180-day Federal Communications Commission (FCC) guideline for state commissions to act on ETC applications, the Commission agreed to read the record in this proceeding.

Several parties filed testimony. NPI filed the direct and rebuttal testimony of Frank Noverr, the Managing Director of NPI. CenturyTel filed the direct and rebuttal testimony of Ted M. Hankins, its Director of State Government Relations. Hiawatha filed the direct and rebuttal testimony of Robert W. Orent, President and CEO of Hiawatha Communications, Inc. The Staff filed the direct testimony of Daniel J. Kearney, Supervisor of the Operations Section of the Commission's Telecommunications Division.

On July 8, 2003, the ALJ conducted an evidentiary hearing. All testimony was bound into the record by stipulation of the parties and cross-examination of witnesses was waived. NPI,

¹ This date was later moved to July 8, 2003.

CenturyTel, MECA, and the Staff filed briefs and reply briefs on July 23 and August 1, 2003, respectively.

II.

POSITIONS OF THE PARTIES

There are two issues in this proceeding. First is whether NPI should be designated as an ETC for purposes of receiving universal service support. Second, if NPI is granted ETC status by the Commission, for what service area(s) should NPI's status be granted.

NPI

NPI provides wireless telecommunications service to over 35,000 Michigan customers through the use of "GSM" technology. Its service area encompasses the Alpena, Grand Rapids, Mt. Pleasant, Muskegon, Petoskey, Saginaw, Sault Ste. Marie, and Traverse City areas.

NPI maintains that it is committed to making the necessary investments to provide high quality service in its service area. NPI further avers that it possesses the necessary financial, managerial, and technical qualifications to provide wireless service and that it provides all the services supported by universal service mechanisms. NPI says that it advertises the availability of those services and charges in media of general distribution as required by federal law.

NPI argues that its application is in the public interest. In support of its position, NPI notes that the FCC has determined that wireless providers may be designated as ETCs.² NPI further notes that the Commission has already determined that ETC designation of wireless carriers can be

² See, NPI application, p. 5, citing, *Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, 12 FCCR 8776, 8858-59, ¶¶ 145-47 (1997).

in the public interest.³ NPI asserts that both the FCC and the Commission recognize that designating competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, promoting innovation and new technologies, and encouraging affordable service.⁴ NPI claims that it is dedicated to serving rural areas in Michigan where there are few choices for local telecommunications services. NPI claims that its customers will benefit from having an expanded local calling area, making intrastate toll calls more affordable.

NPI also requests that the Commission establish "service areas" for purposes of determining universal service support. NPI asserts that the federal Communications Act of 1934, as amended, allows the Commission to designate service areas for purposes of determining universal service support obligations and support mechanisms.⁵ NPI requests that its service area be NPI's service area for purposes of determining universal support obligations and support mechanisms. NPI specifically requests ETC status in each of the counties covered by its service area and the exchanges of the landline telephone companies located therein.

CenturyTel

CenturyTel argues that NPI's application must be denied. CenturyTel believes that NPI's application does not meet the requirements for the granting of ETC status under 47 USC 214(e), because granting ETC status to NPI would not be in the public interest. CenturyTel asserts that

³ See, NPI application, p. 5, citing the November 20, 2001 order in Case No. U-13145.

⁴ See, NPI application, p. 6, citing, *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carriers in the State of Wyoming; Federal-State Joint Board on Universal Service*, Memorandum Opinion and Order, CC Docket No. 96-45, 12 FCCR 48, ¶ 17 (2000); *In re Application of RFB Cellular, Inc. for Designation as an Eligible Telecommunications Carrier*, Case No. U-13145, p. 4 (November 20, 2001).

⁵ See, NPI's application, p. 5, citing, 47 USC 214(e)(2) and (5).

NPI has been successful at providing service without the need for universal service support. It argues that giving NPI universal service funds would give NPI an unearned windfall, would increase charges for Michigan customers, and would ultimately jeopardize the universal service support mechanism altogether.

CenturyTel claims that NPI should not be granted ETC status because, as a wireless carrier, NPI's costs are unrelated to landline costs from which universal service support is derived. CenturyTel also asserts that it is held to higher service standards and regulatory obligations than wireless carriers, which result in higher operating costs for CenturyTel. CenturyTel specifically objects to the fact that NPI has lower costs than CenturyTel, but would receive the same universal service support. CenturyTel argues that granting NPI ETC status would create an uneven playing field, biased against higher cost providers, and could actually reduce competition.

CenturyTel also expresses concern over the fact that wireless carriers are not subject to the same regulatory oversight as incumbent carriers. CenturyTel contends that while wireless carriers are seeking support from a regulatory cost recovery mechanism, the Commission has no regulatory oversight over these carriers to ensure that the monies are used to advance universal service. CenturyTel contends that this uneven playing field, and the fact that the benefits of granting wireless carriers ETC status do not exceed the costs, means that granting NPI's application would not be in the public interest.

CenturyTel also believes that it would be premature for the Commission to grant any ETC applications while the FCC is in the process of considering new rules for the granting of ETC

status to competitive carriers.⁶ CenturyTel suggests waiting until the FCC makes its pronouncements regarding any changes.

Furthermore, if the Commission decides to grant NPI's application, then CenturyTel requests that NPI's ETC status be conditioned on NPI's compliance with regulatory safeguards to ensure a level competitive playing field with rural providers. CenturyTel also argues that allowing NPI to have ETC status in only a portion of a rural ILEC's service area is contrary to the public interest, and that the Commission should not redefine CenturyTel's rural ILEC service area.

Hiawatha

For the reasons stated in CenturyTel's petition to intervene, Hiawatha believes that NPI's application should be denied. Hiawatha asserts that it provides rural telecommunications services and would be economically harmed if NPI's application were granted.

MECA

MECA also opposes NPI's application for designation as an ETC. MECA asserts that it and its members, many of whom provide service to rural areas of the state, will suffer from a loss of universal service support. MECA's asserts that a loss of universal service funds will affect small rural telecommunications providers' ability to maintain and invest in the infrastructure needed to serve high-cost areas.

MECA argues that NPI's application cannot be granted unless granting the application is in the public interest. MECA asserts that merely providing all universal service supported services does not mean that an applicant's application is in the public interest. MECA alleges that the

⁶ See, Public Notice, *Federal-State Joint Board on Universal Service Seeks Comment on Certain of the Commission's Rules Relating to High-Cost Universal Service Support and the ETC Designation Process*, FCC 03J-1, CC Docket No. 96-45 (February 7, 2003).

further public interest finding should be based upon universal service purposes and principles.

MECA asserts that Congress, in placing this added requirement, did not believe that the public interest would always be furthered by encouraging competition in rural areas.

MECA claims that Congress did not intend universal service support to be a subsidy program. Rather, MECA argues, Congress intended universal service support to provide for cost recovery in order to promote infrastructure investment in high-cost rural areas where providing the same quality service at affordable rates comparable to urban areas is not suitable for carriers. MECA argues that without this support, high-cost investment would not have occurred in the past and will not occur in the future. MECA sees infrastructure investment as the primary goal of the universal service program.

MECA argues that the only providers of high quality, facilities-based services throughout their respective service areas are the rural ILECs. MECA claims that once a rural ILEC loses the ability or incentive to continue investing in its network, then rural areas may be deprived of affordable, high quality telecommunications services. MECA asserts that lack of sufficient funding will also affect the deployment of advanced services to consumers, such as schools, libraries, and health care facilities.

Consequently, the granting of ETC status to competitive carriers in areas served by rural carriers, MECA contends, must be properly managed to foster the goals of the federal Act. MECA claims that if the overall demand for funding grows to an unsustainable level, then support payments will be frozen or curtailed, resulting in serious operating issues for many rural telephone companies. MECA claims that this would result in reductions in service quality, higher rates, and perhaps even financial failure of rural companies that serve as the "lifeline" for many remote

customers. MECA argues that the proliferation of "uneconomic competition" in rural areas could jeopardize rural telecommunications services altogether.

MECA also asserts that state commissions have placed far too great an emphasis on the benefits of competition when deciding ETC applications for rural service areas. MECA claims that subsidized competition does not serve the public interest. MECA believes that this over-emphasis has been to the detriment of ensuring that all consumers will retain and gain access to high quality, affordable telecommunications services, including advanced services, on a comparable basis to those available in urban areas. Because of this, MECA believes that the Commission must establish a set of principles to guide its decisions on ETC applications affecting rural areas.

To assist the Commission in establishing this set of principles, MECA offers its own. First, rural consumers should receive access to affordable, high quality telecommunications and information services, including advanced services that are reasonably comparable to those in urban areas and at reasonably comparable prices. Second, high-cost support should not be used as an incentive for uneconomic competition in areas served by rural carriers. Third, universal service funds are a scarce national resource that telephone companies must carefully manage to serve the public interest. Fourth, rural universal service support reflects the difference between the cost of serving high-cost rural areas and the rate levels mandated by policymakers. Fifth, the public interest is served only when the benefits from supporting multiple carriers exceed the costs of supporting multiple networks. Sixth, in areas where costs of supporting multiple networks exceed the public benefits from supporting multiple carriers, the public interest dictates providing support to a single carrier that provides critical telecommunications infrastructure. Seventh, the cost of market failure in high-cost rural Michigan could be severe.

In addition to the guiding set of public interest principles, MECA believes the Commission should create a standard set of minimum qualifications, requirements, and policies to be applied when considering ETC applications for rural service areas. MECA believes that using such a template would help the Commission determine whether the public interest would be served by granting an application. MECA also asserts that such a guideline would also improve the long-term viability of the universal service fund because it believes only the most qualified carriers that are capable of, and committed to, being "true providers" of universal service should receive the ETC designation.

To assist the Commission, MECA offers the following qualifications and requirements that it believes the Commission should adopt when considering ETC applications: 1) A carrier must demonstrate its ability and willingness to provide all supported services throughout the service area. 2) To fulfill the advertising requirement, an ETC must emphasize its universal service obligation to offer service to all consumers in the service area. 3) A carrier must have formal arrangements in place to provide service where facilities have yet to be built. 4) A carrier must have a plan for building out its network once it receives ETC status and must make demonstrative progress toward achieving its plan to retain its status. 5) A carrier must demonstrate that it is financially stable.

In addition to public interest principles and minimum qualifications and requirements, MECA urges adoption of the following policies that it believes the Commission should adhere to when reviewing ETC applications involving rural areas: 1) ETC designations in rural areas should be made at the study area level (an ILEC's entire service territory within one state). 2) The Commission should ensure that competitive ETCs will be capable of providing high-quality service to all customers in the service area should the rural ILEC find it necessary to relinquish its

own ETC designation. 3) Any service quality standards, reporting requirements, and customer billing requirements established by the Commission should apply equally to all ETCs in the state. 4) The Commission should retain the authority to decertify any ETC that is not meeting any of the Commission's qualifications and requirements.

In short, MECA does not believe that granting NPI's application would be in the public interest. MECA also supports deferring the decision on NPI's application until the Federal-State Joint Board clarifies the process for designating ETCs.

Staff

The Staff's testimony references background material that it believes will assist the Commission in determining whether granting NPI's application would be in the public interest. In so doing, the Staff directs attention to portions of the MTA and the federal Act that support the development of competition and use of competition to make available quality telecommunications services at prices that are just, reasonable, and affordable in rural, high-cost areas. The Staff also presents a number of questions for the Commission's reflection. The Staff would like more guidance as to the definition of "public interest." The Staff suggests that healthy competition is the most significant factor in a public interest analysis, followed closely by choice and reasonable rates. In the end, the Staff sees no reason to further delay or deny NPI's ETC designation.

III.

DISCUSSION

ETC Designation

Pursuant to 47 USC 214(e)(2), the Commission may designate more than one carrier in a rural area as an ETC if the Commission finds doing so consistent with the public interest, convenience, and necessity. The parties to this proceeding opposing NPI's application argue that granting NPI's application is not in the public interest. The Commission disagrees. On numerous occasions, the Commission has found that competition can be advantageous to the citizens of this state. In this case, designating NPI as an ETC is in the public interest because it is likely to promote competition and provide benefits to customers in rural, high-cost areas by increasing customer choice, while promoting innovative services and new technologies, and encouraging affordable telecommunications services. Further, NPI provides service where there are few, if any, competitive local exchange carriers.

The Commission disagrees with the significance of the numerous arguments advanced by the opposing parties. To the extent that the opposing parties claim that wireless service is inferior to landline service, the Commission responds that customers should not be denied an opportunity to determine which of these services best meets their needs. In response to the argument that wireless service providers are not subject to the same regulations designed to protect customers, the Commission finds sufficient protection for customers in their right to choose not to use wireless service and to choose from whom to take service. To the extent that the opposing parties are concerned about the effects on themselves of competition from wireless carriers, the Commission does not agree that the public interest requires that they be protected from competition. Moreover, concerns over the effect of competition on the universal service

mechanism are better addressed by the FCC, which is responsible for disbursing the federal universal service funds.

There is ample precedent in support of a wireless carrier's designation of ETC status. On at least two prior occasions, this Commission has granted ETC status to wireless carriers.⁷ In addition, numerous ETC proceedings involving competitive carriers, including wireless carriers, have taken place at the FCC and before other state commissions with the competitive carrier ultimately being granted ETC status.⁸ The Commission provided parties an opportunity to voice their concerns about the granting of ETC status to a wireless carrier by conducting an evidentiary hearing. Virtually every argument raised by the parties in opposition to NPI's application, however, has been addressed previously. No new information was brought to the Commission's attention that would persuade the Commission that designating a competitive carrier ETC status in an area served by a rural ILEC would be contrary to the public interest.

Furthermore, the Legislature has decided that the Commission should not regulate wireless service. For that reason, the Commission must also decline to adopt the numerous conditions proposed, such as requiring NPI to assume carrier of last resort responsibilities, which would require that the Commission regulate wireless service. Consistent with prior designations,

⁷ See, the November 20, 2001 order in Case No. U-13145 and the December 6, 2002 order in Case No. U-13618.

⁸ See, e.g., *RCC Minnesota, Inc. et. al. Request for Designation as Eligible Telecommunications Carrier*, Order, Maine Public Utilities Commission Docket No. 2002-344 (May 13, 2003); *In the Matter of Federal State Joint Board on Universal Service Cellular South License Inc. Petition for Designation as an Eligible Telecommunications Carrier Throughout its Licensed Service Area in the State of Alabama*, Memorandum Opinion and Order, CC Docket No. 96-45, DA 02-3317 (rel. Dec. 4, 2002); *In the Matter of Federal State Joint Board on Universal Service RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunication Carrier Throughout its Licensed Service Area in the State of Alabama*, Memorandum Opinion and Order, CC Docket No. 96-45, DA 02-3181 (rel. Nov. 2, 2002).

however, the Commission reserves the right to conduct audits as needed to determine that the funds are used for permitted purposes.

The Commission declines CenturyTel's and MECA's recommendation to defer its determination on NPI's application until after the Federal-State Joint Board provides further clarity on ETC designations. At this point, there is no time frame in which the Joint Board will act. The Commission, however, has been urged by the FCC to act upon ETC applications within 180 days and the end of that period with respect to this application is fast approaching. The Commission believes the better course of action is to act upon NPI's application within the desired timeframe and take recommendations of the Federal-State Joint Board into account when deciding future cases.

Service Area

NPI also requests that the Commission establish a "service area" for purposes of determining universal service support. The federal Act defines the term "service area" to be a "geographic area established by a State commission for the purpose of determining universal service obligations and support mechanisms." 47 USC 214(e)(5). As stated above, NPI requests that its licensed service area be the designated service area for universal service support. NPI specifically requests ETC status in each of the counties covered by its service area and the exchanges of the ILEC located therein.

Additionally, NPI requests that the Commission petition the FCC to redefine the service areas of the incumbent carriers within its licensed territory, including SBC Ameritech Michigan, CenturyTel, Hiawatha, Upper Peninsula Telephone Company, and Verizon North Inc. NPI's witness testified that NPI is not able to serve the entire study area of each of these companies because of limitations on its FCC license to provide wireless service.

CenturyTel and MECA oppose NPI's service area proposal. CenturyTel and MECA argue that NPI must serve the same service area as the rural ILEC. CenturyTel contends that redefining a rural carrier's service area acts as a disincentive for an additional ETC to serve the most rural parts of a relevant study area. CenturyTel contends that the goal of universal service would be better served by requiring "ETCs to expand their horizons." CenturyTel Brief, p. 18. CenturyTel is also concerned that if additional ETCs are not required to serve a rural ILEC's entire study area, then there is a greater risk of "cream-skimming," where the additional ETC can choose to provide service to lower cost customers without being subject to providing service to attendant higher cost customers while receiving the same level of universal service support as the rural ILEC. MECA also raises concerns about what it described as significant administrative burdens for an ILEC as a result of study area changes. MECA describes how an ILEC's accounting and auditing procedures are built around their existing study areas.

The Commission appreciates the concerns raised by CenturyTel and MECA, but declines to accept the proposal that the ETC's service area should encompass the ILEC's entire study area. In granting ETC status to RFB Cellular and Thumb Cellular, the Commission did not require the wireless carrier to provide service to the entire study area of the rural ILEC.

The Commission, however, also has concerns with NPI's proposals. The Commission declines to redefine the ILEC's study area or to grant NPI's ETC designation based upon political boundaries, such as underlying counties. The study areas of rural ILECs have existed for many years and many accounting and other administrative tasks are based upon those study areas. The Commission is persuaded that designating a service area for purposes of universal service support based upon political boundaries is unwise. The Commission finds that there are administrative efficiencies to be achieved by ensuring that designated service areas do not cross the geographic

boundaries of other relevant telecommunications areas. Political boundaries, for instance, are not congruent with LATAs, exchanges, study areas, or wire centers that are relevant geographic areas for telecommunications purposes.

The Commission is sensitive to the concern that administrative difficulties could abound if every ETC applicant desires its own service area designation. The Commission also appreciates the "cream-skimming" issues that could exist if every ETC applicant is able to carefully craft its own desired service area. Consequently, the Commission has decided to delineate service areas for purposes of universal service support by exchanges. In so doing, the Commission finds that the "cream-skimming" concerns are alleviated because NPI has not specifically picked the areas in which it will serve, but instead the areas were defined in the FCC's wireless licensing process. Additionally, exchanges tend to encompass many types of customers, including rural and high-cost customers. The Commission is persuaded that NPI is not targeting any specific area or that serving any of the partial study areas would result in a windfall due to service to a highly-populated area. Much of the area covered by NPI's wireless carrier license is in very rural parts of Michigan. The Commission is also convinced that designating service areas utilizing entire exchanges will minimize the administrative burden on rural telephone companies to calculate costs at something other than a study area level. This approach requires affected ILECs to disaggregate into service areas that are coterminous with existing telecommunications boundaries for which costs are already calculated.

Finally, the Commission rejects NPI's request that the Commission petition the FCC for the necessary changes to implement this order. Rather, the Commission finds that the burden should be on NPI to obtain whatever relief is necessary, such as changing the geographic scope of its

wireless carrier license and petitioning the FCC for concurrence with the Commission's determinations herein.

The Commission FINDS that:

- a. Jurisdiction is pursuant to 1991 PA 179, as amended, MCL 484.2101 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; and the Commission's Rules of Practice and Procedure, as amended, 1999 AC, R 460.17101 et seq.
- b. NPI should be designated as an ETC for the purpose of receiving federal universal service funds.
- c. NPI's designation as an ETC is in the public interest.
- d. NPI's service area for purposes of determining universal service obligations and support mechanisms should be coterminous with established exchanges.
- e. NPI should be directed to file in this docket (and serve upon the other parties) a listing of the exchanges where it currently provides service or intends to provide service under its license and for which it wishes to receive universal service support and is able to meet universal service obligations.
- f. The granting of NPI's ETC status should be conditioned upon the Commission's reservation of its right to audit all expenditures of these universal service funds.
- g. NPI's ETC designation should be subject to the annual Commission re-certification process.

THEREFORE, IT IS ORDERED that:

A. NPI-Omnipoint Wireless, LLC, is designated as an eligible telecommunications carrier for the purpose of receiving federal universal service funds.

B. NPI-Omnipoint Wireless, LLC's service area for purposes of determining universal service obligations and support mechanisms is to be coterminous with established exchanges.

C. NPI-Omnipoint Wireless, LLC, is directed to file in this docket (and serve upon the other parties) a listing of the exchanges where it currently provides service or intends to provide service under its license and for which it wishes to receive universal service support and is able to meet universal service obligations.

D. NPI-Omnipoint Wireless, LLC's eligible telecommunications carrier designation is conditioned upon the Commission's reservation of its right to audit all expenditures of these universal service funds.

E. NPI-Omnipoint Wireless, LLC's eligible telecommunications carrier designation is subject to the annual Commission re-certification process.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION

/s/ J. Peter Lark
Chair

(S E A L)

/s/ Robert B. Nelson
Commissioner

/s/ Laura Chappelle
Commissioner

By its action of August 26, 2003.

/s/ Robert W. Kehres
Its Acting Executive Secretary

EXHIBIT C
CERTIFICATION

EXHIBIT C

CERTIFICATION

I, the undersigned, Thomas A. Coates, do hereby certify as follows:

1. I serve as Vice-President, Corporate Development for Dobson Cellular Systems, Inc. and each of its affiliates (collectively, "Dobson").

2. I provide this certification in support of Dobson's Application for Designation as an Eligible Telecommunications Carrier ("ETC") in Michigan. Dobson is seeking designation as an ETC under Section 214(e)(2) of the Communications Act of 1934, as amended, so that it can serve the universal service needs of the consumers residing in the Designated Areas.

3. I hereby supplement the Application with additional facts not specifically set forth therein.

4. Dobson provides CMRS service to approximately 1.6 million subscribers in sixteen states. In addition to the licenses it acquired from NPI, as set forth in the Application, Dobson is currently licensed to provide CMRS throughout the following RSAs in Michigan: Michigan RSA 1 – Gogebic; Michigan RSA 3 – Emmet; Michigan RSA 5 – Manistee; and Michigan RSA 10 – Tuscola.

5. At the time of its original Application, NPI was a "telecommunications carrier" as defined in 47 U.S.C. § 153(44). Dobson is a "telecommunications carrier" as defined in Section 153(44). As of the date of closing, Dobson began providing wireless telecommunications services throughout the NPI Service Area as a common carrier. A common carrier is defined under federal law as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio" 47 U.S.C. § 153(10). The FCC has determined that wireless telecommunications is a common carrier service. *See* 47 C.F.R. § 20.9(a).

6. The FCC has determined that the decision to redefine the service area requirement must be made after taking into account three factors derived from the original recommendations of the Federal-State Joint Board on Universal Service ("Joint Board"). The three Joint Board factors are as follows: (1) the risk of seeking designation only in low cost, high support areas, a practice referred to as "creamskimming"; (2) any effect redefinition may have on the rural telephone company's regulatory status; and (3) any additional administrative burdens that may result from redefinition. The *NPI Order* addressed the creamskimming factor, but did not clearly address the latter two factors. In any event, the latter two factors are not present here. See *Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In The Commonwealth of Virginia*, CC Docket 96-45, *Memorandum Opinion and Order*, FCC 03-338 ¶¶ 43-44 (rel. Jan 22, 2004) (holding that because the FCC's rules ensure that that a competitive ETC's receipt of universal service support will have no effect on the amount of universal service support available to incumbent ETCs, redefinition can not have any effect on a rural telephone company's regulatory status, and that redefinition has no effect on the rules applicable to rural telephone companies, nor does it in any other way impose administrative burdens on them).

7. For the reasons set forth in Dobson's Application and stated above, Dobson meets the criteria for ETC designation under Section 214(e) of the Act.


8. I am a corporate officer responsible for certifying Dobson's use of Federal High Cost Loop Support Funds (HCL), Local Switching Support (LSS) and High Cost Universal Service Support. Dobson has applied to be designated an eligible telecommunications carrier within the meaning of § 214(e) of the Federal Telecommunications Act of 1996 for the purpose of becoming eligible to receive universal service support pursuant to § 254(e) of the Act. In

compliance with the FCC's Order of November 2, 1999 and May 23, 2001 in Docket No. 96-45, as well as 47 C.F.R. §§ 54.313 and 54.314, Dobson hereby states that it will use the Federal High Cost Support Funds that it receives in 2004 and 2005 only for the provision, maintenance and upgrading of facilities and services for which the support is intended pursuant to § 254(e) of the Federal Telecommunications Act of 1996.

9. I have reviewed the Application and confirm the facts stated therein, of which I have personal knowledge, are true and correct to the best of my present knowledge, information and belief.


Thomas A. Coates

Subscribed and sworn to before me
this 1 day of September, 2004.


Notary Public

2-8-2007

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EXHIBIT D

DOBSON'S SERVICE AREA

Dobson's service area for purposes of this Application encompasses areas within the following FCC-defined Basic Trading Areas ("BTAs") formerly served by NPI: Alpena BTA 011, Grand Rapids BTA 169, Mt. Pleasant BTA 307, Muskegon BTA 310, Petoskey BTA 345, Saginaw BTA 390, Sault Ste. Marie BTA 409, and Traverse City BTA 446. Dobson requests ETC designation in the non-rural telephone company wire centers, rural telephone company study areas and rural telephone company wire centers that are wholly contained within Dobson's FCC-licensed service area as set forth on the attached tables. The attached tables were created using publicly available data and mapping software to identify only those wire centers and study areas that are completely covered by the above-described licensed areas.

**NON-RURAL TELEPHONE COMPANY WIRE CENTERS FULLY CONTAINED
WITHIN DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL
ACMEMIMN	315090	MICHIGAN BELL TEL. CO.	N
BELHMIMN	315090	MICHIGAN BELL TEL. CO.	N
BGRPMIMN	315090	MICHIGAN BELL TEL. CO.	N
BLDWMIMN	315090	MICHIGAN BELL TEL. CO.	N
BOCYMIBC	315090	MICHIGAN BELL TEL. CO.	N
BVTNMIVT	315090	MICHIGAN BELL TEL. CO.	N
CDLCMIMN	315090	MICHIGAN BELL TEL. CO.	N
CHBYMIMN	315090	MICHIGAN BELL TEL. CO.	N
CHBYMISO	315090	MICHIGAN BELL TEL. CO.	N
CHVXMIMN	315090	MICHIGAN BELL TEL. CO.	N
CLARMICL	315090	MICHIGAN BELL TEL. CO.	N
CLNMIMN	315090	MICHIGAN BELL TEL. CO.	N
CRTSMIMN	315090	MICHIGAN BELL TEL. CO.	N
EJRDMIMN	315090	MICHIGAN BELL TEL. CO.	N
ELKRMIMN	315090	MICHIGAN BELL TEL. CO.	N
ENGDMIMN	315090	MICHIGAN BELL TEL. CO.	N
ETWSMIMN	315090	MICHIGAN BELL TEL. CO.	N
EVRTMIMN	315090	MICHIGAN BELL TEL. CO.	N
FFLKMIMN	315090	MICHIGAN BELL TEL. CO.	N
FONTMIMN	315090	MICHIGAN BELL TEL. CO.	N
FRFTMIMN	315090	MICHIGAN BELL TEL. CO.	N
FRMTMIMN	315090	MICHIGAN BELL TEL. CO.	N
FRWLMIMN	315090	MICHIGAN BELL TEL. CO.	N
FRWLMIWS	315090	MICHIGAN BELL TEL. CO.	N
GLDWMIGL	315090	MICHIGAN BELL TEL. CO.	N
GRNTMIMN	315090	MICHIGAN BELL TEL. CO.	N
GRWNMIMN	315090	MICHIGAN BELL TEL. CO.	N
HRSNMIMN	315090	MICHIGAN BELL TEL. CO.	N
HRSPMIMN	315090	MICHIGAN BELL TEL. CO.	N
HRTAMIMN	315090	MICHIGAN BELL TEL. CO.	N
INRVMIMN	315090	MICHIGAN BELL TEL. CO.	N
IRONMIIR	315090	MICHIGAN BELL TEL. CO.	N
KLKSMIKK	315090	MICHIGAN BELL TEL. CO.	N
LKLLMIMN	315090	MICHIGAN BELL TEL. CO.	N
LROYMIMN	315090	MICHIGAN BELL TEL. CO.	N
LTHRMIMN	315090	MICHIGAN BELL TEL. CO.	N
MARNMIMN	315090	MICHIGAN BELL TEL. CO.	N
MCBNMIMN	315090	MICHIGAN BELL TEL. CO.	N
MCCYMIMN	315090	MICHIGAN BELL TEL. CO.	N
MNCLMIMN	315090	MICHIGAN BELL TEL. CO.	N
MNSTMIMN	315090	MICHIGAN BELL TEL. CO.	N
MNTNMIMN	315090	MICHIGAN BELL TEL. CO.	N

**NON-RURAL TELEPHONE COMPANY WIRE CENTERS FULLY CONTAINED
WITHIN DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA
(CONTINUED)**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL
MRLYMIMN	315090	MICHIGAN BELL TEL. CO.	N
NPRTMIMN	315090	MICHIGAN BELL TEL. CO.	N
NWAYMINW	315090	MICHIGAN BELL TEL. CO.	N
NWBYMIMN	315090	MICHIGAN BELL TEL. CO.	N
ONKMMIMN	315090	MICHIGAN BELL TEL. CO.	N
OSCDMIMN	315090	MICHIGAN BELL TEL. CO.	N
PLSTMIMN	315090	MICHIGAN BELL TEL. CO.	N
PTSKMIMN	315090	MICHIGAN BELL TEL. CO.	N
RDCYMIMN	315090	MICHIGAN BELL TEL. CO.	N
RSBHMIMN	315090	MICHIGAN BELL TEL. CO.	N
SCVLMIMN	315090	MICHIGAN BELL TEL. CO.	N
SSMRMIMN	315090	MICHIGAN BELL TEL. CO.	N
STHLMIMN	315090	MICHIGAN BELL TEL. CO.	N
STIGMIMN	315090	MICHIGAN BELL TEL. CO.	N
TRCYMIMN	315090	MICHIGAN BELL TEL. CO.	N
TUSTMIMN	315090	MICHIGAN BELL TEL. CO.	N
WBRNMIMN	315090	MICHIGAN BELL TEL. CO.	N
WHCLMIAD	315090	MICHIGAN BELL TEL. CO.	N
WLBGMIWB	315090	MICHIGAN BELL TEL. CO.	N
WLVRMIMN	315090	MICHIGAN BELL TEL. CO.	N
WNLKMIWL	315090	MICHIGAN BELL TEL. CO.	N
ALDNMIXH	310695	VERIZON NORTH INC. - MI	N
ALMAMIXG	310695	VERIZON NORTH INC. - MI	N
ALPEMIXG	310695	VERIZON NORTH INC. - MI	N
ASHYMIXL	310695	VERIZON NORTH INC. - MI	N
ATLNMIXG	310695	VERIZON NORTH INC. - MI	N
BLLRMIXG	310695	VERIZON NORTH INC. - MI	N
BRRGMIXG	310695	VERIZON NORTH INC. - MI	N
BRYTMIXG	310695	VERIZON NORTH INC. - MI	N
CLRVMIXH	310695	VERIZON NORTH INC. - MI	N
CNLKMIXG	310695	VERIZON NORTH INC. - MI	N
CRCYMIXG	310695	VERIZON NORTH INC. - MI	N
EDMRMIXG	310695	VERIZON NORTH INC. - MI	N
ELWOMIXH	310695	VERIZON NORTH INC. - MI	N
ESPTMIXG	310695	VERIZON NORTH INC. - MI	N
FNWKMIXG	310695	VERIZON NORTH INC. - MI	N
FRPRMIXG	310695	VERIZON NORTH INC. - MI	N
FRVWMIXG	310695	VERIZON NORTH INC. - MI	N
GRYLMIXG	310695	VERIZON NORTH INC. - MI	N
GYLRMIXG	310695	VERIZON NORTH INC. - MI	N
HARTMIXG	310695	VERIZON NORTH INC. - MI	N
HBLKMIXG	310695	VERIZON NORTH INC. - MI	N

**NON-RURAL TELEPHONE COMPANY WIRE CENTERS FULLY CONTAINED
WITHIN DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA
(CONTINUED)**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL
HGLKMIXG	310695	VERIZON NORTH INC. - MI	N
HGPTMIXL	310695	VERIZON NORTH INC. - MI	N
HLMNMIXG	310695	VERIZON NORTH INC. - MI	N
HLTNMIXG	310695	VERIZON NORTH INC. - MI	N
HRVLMIXG	310695	VERIZON NORTH INC. - MI	N
HSPRMIXH	310695	VERIZON NORTH INC. - MI	N
HWCYMIXG	310695	VERIZON NORTH INC. - MI	N
ITHCMIXG	310695	VERIZON NORTH INC. - MI	N
LCHNMIXG	310695	VERIZON NORTH INC. - MI	N
LDNGMIXG	310695	VERIZON NORTH INC. - MI	N
LKVWMIXG	310695	VERIZON NORTH INC. - MI	N
LLALMIXG	310695	VERIZON NORTH INC. - MI	N
LNCLMIXG	310695	VERIZON NORTH INC. - MI	N
LSTNMIXG	310695	VERIZON NORTH INC. - MI	N
MCBRMIXG	310695	VERIZON NORTH INC. - MI	N
MDTNMIXG	310695	VERIZON NORTH INC. - MI	N
MIO MIXG	310695	VERIZON NORTH INC. - MI	N
MNPLMIXG	310695	VERIZON NORTH INC. - MI	N
MSKGMIXK	310695	VERIZON NORTH INC. - MI	N
MSKGMIXL	310695	VERIZON NORTH INC. - MI	N
MSKGMIXM	310695	VERIZON NORTH INC. - MI	N
MSKGMIXN	310695	VERIZON NORTH INC. - MI	N
MSKGMIXQ	310695	VERIZON NORTH INC. - MI	N
MSKGMIXR	310695	VERIZON NORTH INC. - MI	N
MSKHMIXP	310695	VERIZON NORTH INC. - MI	N
NRSHMIXG	310695	VERIZON NORTH INC. - MI	N
ONWYMIXG	310695	VERIZON NORTH INC. - MI	N
OSNKMIXG	310695	VERIZON NORTH INC. - MI	N
PDVLMIXM	310695	VERIZON NORTH INC. - MI	N
PNTWMIXG	310695	VERIZON NORTH INC. - MI	N
POMPMIXG	310695	VERIZON NORTH INC. - MI	N
POSNMIXG	310695	VERIZON NORTH INC. - MI	N
RGCYMIXG	310695	VERIZON NORTH INC. - MI	N
RMUSMIXG	310695	VERIZON NORTH INC. - MI	N
RSCMMIXG	310695	VERIZON NORTH INC. - MI	N
RVDL MIXG	310695	VERIZON NORTH INC. - MI	N
SDNYMIXG	310695	VERIZON NORTH INC. - MI	N
SHLBMIXG	310695	VERIZON NORTH INC. - MI	N
SHPHMIXG	310695	VERIZON NORTH INC. - MI	N
SHRDMIXG	310695	VERIZON NORTH INC. - MI	N
SNTNMIXG	310695	VERIZON NORTH INC. - MI	N
STLSMIXG	310695	VERIZON NORTH INC. - MI	N

**NON-RURAL TELEPHONE COMPANY WIRE CENTERS FULLY CONTAINED
WITHIN DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA
(CONTINUED)**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL
STWDMIXG	310695	VERIZON NORTH INC. - MI	N
SXLKMIXG	310695	VERIZON NORTH INC. - MI	N
TNLKMIXG	310695	VERIZON NORTH INC. - MI	N
TRRVMIXG	310695	VERIZON NORTH INC. - MI	N
VNDRMIXG	310695	VERIZON NORTH INC. - MI	N
VTBGMIXG	310695	VERIZON NORTH INC. - MI	N
WDMNMIXG	310695	VERIZON NORTH INC. - MI	N
WHTHMIXG	310695	VERIZON NORTH INC. - MI	N
WLKMMIXG	310695	VERIZON NORTH INC. - MI	N

**RURAL TELEPHONE COMPANY STUDY AREAS FULLY CONTAINED
WITHIN DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL
BCKLMIXI	310704	Ace Tel. Co. of Michigan Inc.	R
CPMHMIXI	310704	Ace Tel. Co. of Michigan Inc.	R
HXVLMIXI	310704	Ace Tel. Co. of Michigan Inc.	R
MSCKMIXI	310704	Ace Tel. Co. of Michigan Inc.	R
SBRDMIXI	310704	Ace Tel. Co. of Michigan Inc.	R
BLNCMIXI	310678	Blanchard Tel. Assn. Inc.	R
CARRMIXA	310683	Carr Telephone Co. Inc	R
FLMOMIXI	310705	CenturyTel of Northern Michigan, Inc.	R
KGSLMIXI	310705	CenturyTel of Northern Michigan, Inc.	R
BRMLMIXI	310680	Chippewa County Tel. Co.	R
BBISMIXI	310677	Island Tel. Co. dba TDS Telecom	R
STJMMIXI	310677	Island Tel. Co. dba TDS Telecom	R
BRTHMIXI	310703	Kaleva Telephone Co.	R
DBLNMIXI	310703	Kaleva Telephone Co.	R
KLVAMIXI	310703	Kaleva Telephone Co.	R
WLTNMIXI	310703	Kaleva Telephone Co.	R
OLMSMIXI	310720	Peninsula Telephone Company	R
WINNMIXI	310737	Winn Tel. Co.	R

**RURAL TELEPHONE COMPANY STUDY AREAS PARTIALLY WITHIN
DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL	SERVICE AREA REDEFINED
AUGRMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
CHLKMIXI	310671	CenturyTel Midwest-Michigan, Inc.	R	
MCSTMIXI	310671	CenturyTel Midwest-Michigan, Inc.	R	
OMERMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	R	
ALNSMIXJ	310702	CenturyTel of Michigan, Inc.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
BNFLMIXI	310702	CenturyTel of Michigan, Inc.	R	
BRLKMIXI	310702	CenturyTel of Michigan, Inc.	R	
BRTSMIXI	310702	CenturyTel of Michigan, Inc.	R	
CEDRMIXI	310702	CenturyTel of Michigan, Inc.	R	
CRYSMIXI	310702	CenturyTel of Michigan, Inc.	R	
EMIRMIXJ	310702	CenturyTel of Michigan, Inc.	R	
EMPRMIXI	310702	CenturyTel of Michigan, Inc.	R	
GLARMIXI	310702	CenturyTel of Michigan, Inc.	R	
GLNEMIXI	310702	CenturyTel of Michigan, Inc.	R	
HALEMIXA	310702	CenturyTel of Michigan, Inc.	R	
HNORMIXI	310702	CenturyTel of Michigan, Inc.	R	
HOPMIXI	310702	CenturyTel of Michigan, Inc.	R	
LKANMIXI	310702	CenturyTel of Michigan, Inc.	R	
LKCYMIXI	310702	CenturyTel of Michigan, Inc.	R	
LVRGMIXI	310702	CenturyTel of Michigan, Inc.	R	
MRRTMIXI	310702	CenturyTel of Michigan, Inc.	R	
MSTWMIXI	310702	CenturyTel of Michigan, Inc.	R	
SLKHMIXI	310702	CenturyTel of Michigan, Inc.	R	
STBYMIXI	310702	CenturyTel of Michigan, Inc.	R	
SXLSMIXI	310702	CenturyTel of Michigan, Inc.	R	
VCVLMIXI	310702	CenturyTel of Michigan, Inc.	R	
WHMRMIXI	310702	CenturyTel of Michigan, Inc.	R	
CDVLMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
DETRMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	
KNRSMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	
PKFDMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	
RDYRMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	
DRPKMIXI	310713	Hiawatha Telephone Co. Inc.	R	<i>NPI-Omnipoint - Case No. U-13714</i>
ECKRMIXI	310713	Hiawatha Telephone Co. Inc.	R	
HLBRMIXI	310713	Hiawatha Telephone Co. Inc.	R	
PRDSMIXI	310713	Hiawatha Telephone Co. Inc.	R	
ALBAMIXJ	310721	Pigeon Telephone Company	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
LKNRMIXJ	310721	Pigeon Telephone Company	R	
TWNGMI01	310721	Pigeon Telephone Company	R	
AMBLMIXJ	310732	Upper Peninsula Telephone Company	R	<i>NPI-Omnipoint - Case No. U-13714</i>
CTPOMIXJ	310732	Upper Peninsula Telephone Company	R	
DRISMIXI	310732	Upper Peninsula Telephone Company	R	
GRHRMIXI	310732	Upper Peninsula Telephone Company	R	
MRVRMIXI	310732	Upper Peninsula Telephone Company	R	
RXTNMIXI	310732	Upper Peninsula Telephone Company	R	

**RURAL TELEPHONE COMPANY STUDY AREAS PARTIALLY WITHIN
DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA
(CONTINUED)**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL	SERVICE AREA REDEFINED
SCPTMIXI	310732	Upper Peninsula Telephone Company	R	
ALGRMIXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	<i>NPI-Omnipoint – Case No. U-13714</i>
LPTNMIXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
PRSCMIXP	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
RSCYMIXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
STNGMIXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
SNFRMIXI	310738	Wolverine Tel. Co.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>

Note: The Commission's redefinition determination in Case No. U-13765 is presently before the Federal Communications Commission on Alltel Communication, Inc.'s Petition for Consent to Redefine the Service Areas of Rural Telephone Companies in the State of Michigan filed December 17, 2003.

EXHIBIT E

SUPPORTED SERVICES

1. Voice-grade access to the public switched telephone network. Voice-grade access means the ability to make and receive phone calls within a voice bandwidth range of between 300 and 3000 Hertz (approximately 2700 Hertz). 47 C.F.R. § 54.101(a)(1); *In the Matter of Federal State Joint Board on Universal Service*, CC Docket No. 96-45, *Fourth Order on Reconsideration*, FCC 97-420, ¶15-16 (rel. Dec. 30, 1997). There is no requirement to support high-speed data transmissions. *Universal Service Order*, ¶¶ 63-64. Dobson has interconnection agreements and arrangements with local telephone companies. Through its interconnection arrangements with these carriers, all of Dobson's Michigan customers are able to make and receive calls on the public switched telephone network within the specified bandwidth.

2. Local usage. Dobson provides its customers with an amount of local usage, free of charge, as required by Rule 54.101(a)(2). Unlimited local usage is not required of any ETC. *In the Matter of Federal-State Board on Universal Service*, CC Docket No. 96-45, *Order and Order on Reconsideration*, FCC 03-170 (rel. July 14, 2003) ("*July 2003 Order*"). Dobson will include local usage in all of its service offerings, and will also comply with any local usage requirements adopted by the FCC in the future and required of federal ETCs.

3. DTMF signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. *Universal Service Order*, ¶ 71. The FCC has recognized that because "wireless carriers use out-of-band digital signaling mechanisms ... it is appropriate to support out-of-band signaling mechanisms as an alternative to DTMF signaling." *Id.* Dobson currently uses out-of-band digital signaling and in-band multi-frequency signaling that is functionally equivalent to DTMF signaling.

4. Single-party service or its functional equivalent. "Single party service" means that only one party will be served by each subscriber loop or access line, in contrast to a multi-party line. A CMRS provider meets this requirement when it offers a dedicated message path for the length of a user's particular transmission. 47 C.F.R. § 54.101(a)(4). Dobson provides a dedicated message path for the duration of all customer calls.

5. Access to emergency services. The ability to reach a public service answering point ("PSAP") by dialing 911 is a required service in any universal service offering. 47 C.F.R. § 54.101(a)(5); *Universal Service Order*, ¶ 72. The FCC also requires that a carrier provide access to enhanced 911 ("E911"), which includes the capability to provide both automatic numbering information ("ANI") and automatic location information ("ALI") when a PSAP submits a compliant request to the carrier. 47 C.F.R. § 54.101(a)(5). In order to qualify a request as compliant, the PSAP must be capable of receiving and utilizing the data, and a mechanism for recovering the PSAP's costs of the E911 service must be in place. 47 C.F.R. § 20.18(j). Dobson provides all of its customers with the ability to access emergency services by dialing "911," which will be included in Dobson's universal service offering. Dobson is currently in compliance with federal E911 obligations and is working with all PSAPs in the Designated Areas to implement E911 services consistent with the requirements of federal law.

6. Access to operator services. Access to operator services means any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. 47 C.F.R. § 54.101(a)(6). Dobson meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, interexchange carriers ("IXCs"), etc.).

7. Access to interexchange service. An ETC must offer consumers access to interexchange service for the purposes of making and receiving toll or interexchange calls. 47 C.F.R. § 54.101(a)(7). Equal access to interexchange service - i.e., the ability of a customer to access a presubscribed long distance carrier by dialing 1+number - is not a requirement. See *Universal Service Order*, ¶ 78; *July 2003 Order*, ¶ 33. Dobson provides all of its customers with the ability to make and receive interexchange, or toll, calls through direct interconnection arrangements the Company has with several IXCs. Additionally, customers can reach their IXC of choice by dialing the appropriate access code. Dobson thus satisfies this service requirement.

8. Access to directory assistance. An ETC must also provide access to directory assistance. 47 C.F.R. § 54.101(a)(8). Dobson meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "555-1212."

9. Toll limitation for qualifying, low-income consumers. An ETC must offer toll limitation services to qualifying Lifeline customers at no charge. 47 C.F.R. § 54.101(a)(9). "Toll limitation" is defined as either toll blocking or toll control if a carrier is incapable of providing both, but as both toll blocking and toll control if a carrier can provide both. 47 C.F.R. § 54.400(d). Toll blocking allows consumers to elect not to allow the completion of outgoing toll calls. Toll control allows consumers to specify a certain amount of toll usage that may be incurred per month or per billing cycle. 47 C.F.R. § 54.500(b)-(c). Dobson currently has no Lifeline customers in Michigan because only a carrier designated as an ETC can participate in Lifeline. See 47 C.F.R. § 54.400-.415. Once designated an ETC, Dobson will participate in Lifeline and Link-Up and will provide toll blocking in satisfaction of federal requirements. Dobson is not, at this time, capable of providing toll control. Thus, Dobson will utilize its existing toll-blocking technology to provide the service to its Lifeline customers, at no charge, as part of its service offerings.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

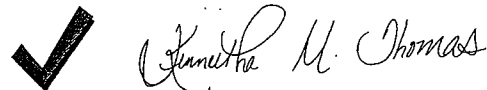
In the Matter of the Application of Dobson)
Cellular Systems, Inc. for Designation as)
an Eligible Telecommunications Carrier)
Pursuant to Section 214(e)(2) of the)
Communications Act of 1934)
_____)

Case No. U-14257

STATE OF MICHIGAN)
) ss
INGHAM COUNTY)

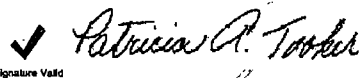
PROOF OF SERVICE

Kinneitha M. Thomas, being duly sworn, deposes and says that she is an employee of Clark Hill PLC, and that on September 1, 2004, a copy of Dobson Cellular Systems, Inc.'s Application, in the above-captioned proceeding, was served via Electronic and United States Postal Service First Class Mail upon those parties listed on the attached service list.



Kinneitha M. Thomas

Subscribed and sworn to before me
the 1st day of September, 2004.



Signature Valid

Digitally signed by Patricia
A. Tooker
DN: cn=Patricia A. Tooker,
o=Clark Hill PLC, c=US
Date: 2004.09.01 14:21:33
+04'00'

Patricia A. Tooker, Notary Public
Eaton County, Michigan.
Acting in Ingham County, Michigan.
My Commission Expires: April 5, 2005.

MPSC Case No. U-14257

SERVICE LIST

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Exhibit C

**Michigan PSC's August 26, 2003 Opinion and Order Approving
NPI-Omnipoint Wireless LLC's Application for ETC Designation**

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)	
NPI-OMNIPOINT WIRELESS, LLC,)	
for designation as an eligible telecommunications)	Case No. U-13714
carrier pursuant to Section 214(e)(6) of the)	
Communications Act of 1934.)	
_____)	

At the August 26, 2003 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. J. Peter Lark, Chair
Hon. Robert B. Nelson, Commissioner
Hon. Laura Chappelle, Commissioner

OPINION AND ORDER

I.

HISTORY OF PROCEEDINGS

On March 3, 2003, NPI-Omnipoint Wireless, LLC, (NPI) filed an application seeking designation as an eligible telecommunications carrier (ETC) under Section 214(e)(6) of the federal Communications Act of 1934, as amended, 47 USC 214(e)(6) (federal Act) and Sections 201 and 203 of the Michigan Telecommunications Act, MCL 484.2101 et seq. (MTA). If granted, designation as an ETC would permit NPI to receive universal service support in Michigan.

Several parties petitioned to participate in the proceeding. On May 6, 2003, the Commission Staff (Staff) filed a notice of appearance. On May 21, 2003, CenturyTel of Michigan, Inc., CenturyTel Midwest-Michigan, Inc., CenturyTel of Northern Michigan, Inc., and CenturyTel of

Upper Michigan, Inc., (CenturyTel) jointly filed a petition to intervene. Also on May 21, 2003, Hiawatha Telephone Company, Chippewa County Telephone Company, Midway Telephone Company, and Ontonagon County Telephone Company (Hiawatha) jointly petitioned to intervene. The Michigan Exchange Carriers Association, Inc., (MECA), a voluntary association of 33 small incumbent local exchange carriers (ILECs) in Michigan, also filed a petition. On May 28, 2003, AT&T Communications of Michigan, Inc., and TCG Detroit (AT&T) filed a notice of intent to participate.

On May 28, 2003, a pre-hearing conference was conducted by Administrative Law Judge Mark E. Cummins (ALJ). NPI, CenturyTel, Hiawatha, MECA, AT&T, and the Staff attended. The ALJ ordered the parties to file their direct testimony by June 10, 2003 and rebuttal testimony by June 23, 2003. Cross-examination of witnesses was to take place on July 7, 2003,¹ with a briefing schedule to be determined thereafter. In order to meet the 180-day Federal Communications Commission (FCC) guideline for state commissions to act on ETC applications, the Commission agreed to read the record in this proceeding.

Several parties filed testimony. NPI filed the direct and rebuttal testimony of Frank Noverr, the Managing Director of NPI. CenturyTel filed the direct and rebuttal testimony of Ted M. Hankins, its Director of State Government Relations. Hiawatha filed the direct and rebuttal testimony of Robert W. Orent, President and CEO of Hiawatha Communications, Inc. The Staff filed the direct testimony of Daniel J. Kearney, Supervisor of the Operations Section of the Commission's Telecommunications Division.

On July 8, 2003, the ALJ conducted an evidentiary hearing. All testimony was bound into the record by stipulation of the parties and cross-examination of witnesses was waived. NPI,

¹ This date was later moved to July 8, 2003.

CenturyTel, MECA, and the Staff filed briefs and reply briefs on July 23 and August 1, 2003, respectively.

II.

POSITIONS OF THE PARTIES

There are two issues in this proceeding. First is whether NPI should be designated as an ETC for purposes of receiving universal service support. Second, if NPI is granted ETC status by the Commission, for what service area(s) should NPI's status be granted.

NPI

NPI provides wireless telecommunications service to over 35,000 Michigan customers through the use of "GSM" technology. Its service area encompasses the Alpena, Grand Rapids, Mt. Pleasant, Muskegon, Petoskey, Saginaw, Sault Ste. Marie, and Traverse City areas.

NPI maintains that it is committed to making the necessary investments to provide high quality service in its service area. NPI further avers that it possesses the necessary financial, managerial, and technical qualifications to provide wireless service and that it provides all the services supported by universal service mechanisms. NPI says that it advertises the availability of those services and charges in media of general distribution as required by federal law.

NPI argues that its application is in the public interest. In support of its position, NPI notes that the FCC has determined that wireless providers may be designated as ETCs.² NPI further notes that the Commission has already determined that ETC designation of wireless carriers can be

² See, NPI application, p. 5, citing, *Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, 12 FCCR 8776, 8858-59, ¶¶ 145-47 (1997).

in the public interest.³ NPI asserts that both the FCC and the Commission recognize that designating competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, promoting innovation and new technologies, and encouraging affordable service.⁴ NPI claims that it is dedicated to serving rural areas in Michigan where there are few choices for local telecommunications services. NPI claims that its customers will benefit from having an expanded local calling area, making intrastate toll calls more affordable.

NPI also requests that the Commission establish “service areas” for purposes of determining universal service support. NPI asserts that the federal Communications Act of 1934, as amended, allows the Commission to designate service areas for purposes of determining universal service support obligations and support mechanisms.⁵ NPI requests that its service area be NPI’s service area for purposes of determining universal support obligations and support mechanisms. NPI specifically requests ETC status in each of the counties covered by its service area and the exchanges of the landline telephone companies located therein.

CenturyTel

CenturyTel argues that NPI’s application must be denied. CenturyTel believes that NPI’s application does not meet the requirements for the granting of ETC status under 47 USC 214(e), because granting ETC status to NPI would not be in the public interest. CenturyTel asserts that

³ See, NPI application, p. 5, citing the November 20, 2001 order in Case No. U-13145.

⁴ See, NPI application, p. 6, citing, *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carriers in the State of Wyoming; Federal-State Joint Board on Universal Service*, Memorandum Opinion and Order, CC Docket No. 96-45, 12 FCCR 48, ¶ 17 (2000); *In re Application of RFB Cellular, Inc. for Designation as an Eligible Telecommunications Carrier*, Case No. U-13145, p. 4 (November 20, 2001).

⁵ See, NPI’s application, p. 5, citing, 47 USC 214(e)(2) and (5).

NPI has been successful at providing service without the need for universal service support. It argues that giving NPI universal service funds would give NPI an unearned windfall, would increase charges for Michigan customers, and would ultimately jeopardize the universal service support mechanism altogether.

CenturyTel claims that NPI should not be granted ETC status because, as a wireless carrier, NPI's costs are unrelated to landline costs from which universal service support is derived. CenturyTel also asserts that it is held to higher service standards and regulatory obligations than wireless carriers, which result in higher operating costs for CenturyTel. CenturyTel specifically objects to the fact that NPI has lower costs than CenturyTel, but would receive the same universal service support. CenturyTel argues that granting NPI ETC status would create an uneven playing field, biased against higher cost providers, and could actually reduce competition.

CenturyTel also expresses concern over the fact that wireless carriers are not subject to the same regulatory oversight as incumbent carriers. CenturyTel contends that while wireless carriers are seeking support from a regulatory cost recovery mechanism, the Commission has no regulatory oversight over these carriers to ensure that the monies are used to advance universal service. CenturyTel contends that this uneven playing field, and the fact that the benefits of granting wireless carriers ETC status do not exceed the costs, means that granting NPI's application would not be in the public interest.

CenturyTel also believes that it would be premature for the Commission to grant any ETC applications while the FCC is in the process of considering new rules for the granting of ETC

status to competitive carriers.⁶ CenturyTel suggests waiting until the FCC makes its pronouncements regarding any changes.

Furthermore, if the Commission decides to grant NPI's application, then CenturyTel requests that NPI's ETC status be conditioned on NPI's compliance with regulatory safeguards to ensure a level competitive playing field with rural providers. CenturyTel also argues that allowing NPI to have ETC status in only a portion of a rural ILEC's service area is contrary to the public interest, and that the Commission should not redefine CenturyTel's rural ILEC service area.

Hiawatha

For the reasons stated in CenturyTel's petition to intervene, Hiawatha believes that NPI's application should be denied. Hiawatha asserts that it provides rural telecommunications services and would be economically harmed if NPI's application were granted.

MECA

MECA also opposes NPI's application for designation as an ETC. MECA asserts that it and its members, many of whom provide service to rural areas of the state, will suffer from a loss of universal service support. MECA's asserts that a loss of universal service funds will affect small rural telecommunications providers' ability to maintain and invest in the infrastructure needed to serve high-cost areas.

MECA argues that NPI's application cannot be granted unless granting the application is in the public interest. MECA asserts that merely providing all universal service supported services does not mean that an applicant's application is in the public interest. MECA alleges that the

⁶ See, Public Notice, *Federal-State Joint Board on Universal Service Seeks Comment on Certain of the Commission's Rules Relating to High-Cost Universal Service Support and the ETC Designation Process*, FCC 03J-1, CC Docket No. 96-45 (February 7, 2003).

further public interest finding should be based upon universal service purposes and principles. MECA asserts that Congress, in placing this added requirement, did not believe that the public interest would always be furthered by encouraging competition in rural areas.

MECA claims that Congress did not intend universal service support to be a subsidy program. Rather, MECA argues, Congress intended universal service support to provide for cost recovery in order to promote infrastructure investment in high-cost rural areas where providing the same quality service at affordable rates comparable to urban areas is not suitable for carriers. MECA argues that without this support, high-cost investment would not have occurred in the past and will not occur in the future. MECA sees infrastructure investment as the primary goal of the universal service program.

MECA argues that the only providers of high quality, facilities-based services throughout their respective service areas are the rural ILECs. MECA claims that once a rural ILEC loses the ability or incentive to continue investing in its network, then rural areas may be deprived of affordable, high quality telecommunications services. MECA asserts that lack of sufficient funding will also affect the deployment of advanced services to consumers, such as schools, libraries, and health care facilities.

Consequently, the granting of ETC status to competitive carriers in areas served by rural carriers, MECA contends, must be properly managed to foster the goals of the federal Act. MECA claims that if the overall demand for funding grows to an unsustainable level, then support payments will be frozen or curtailed, resulting in serious operating issues for many rural telephone companies. MECA claims that this would result in reductions in service quality, higher rates, and perhaps even financial failure of rural companies that serve as the “lifeline” for many remote

customers. MECA argues that the proliferation of “uneconomic competition” in rural areas could jeopardize rural telecommunications services altogether.

MECA also asserts that state commissions have placed far too great an emphasis on the benefits of competition when deciding ETC applications for rural service areas. MECA claims that subsidized competition does not serve the public interest. MECA believes that this over-emphasis has been to the detriment of ensuring that all consumers will retain and gain access to high quality, affordable telecommunications services, including advanced services, on a comparable basis to those available in urban areas. Because of this, MECA believes that the Commission must establish a set of principles to guide its decisions on ETC applications affecting rural areas.

To assist the Commission in establishing this set of principles, MECA offers its own. First, rural consumers should receive access to affordable, high quality telecommunications and information services, including advanced services that are reasonably comparable to those in urban areas and at reasonably comparable prices. Second, high-cost support should not be used as an incentive for uneconomic competition in areas served by rural carriers. Third, universal service funds are a scarce national resource that telephone companies must carefully manage to serve the public interest. Fourth, rural universal service support reflects the difference between the cost of serving high-cost rural areas and the rate levels mandated by policymakers. Fifth, the public interest is served only when the benefits from supporting multiple carriers exceed the costs of supporting multiple networks. Sixth, in areas where costs of supporting multiple networks exceed the public benefits from supporting multiple carriers, the public interest dictates providing support to a single carrier that provides critical telecommunications infrastructure. Seventh, the cost of market failure in high-cost rural Michigan could be severe.

In addition to the guiding set of public interest principles, MECA believes the Commission should create a standard set of minimum qualifications, requirements, and policies to be applied when considering ETC applications for rural service areas. MECA believes that using such a template would help the Commission determine whether the public interest would be served by granting an application. MECA also asserts that such a guideline would also improve the long-term viability of the universal service fund because it believes only the most qualified carriers that are capable of, and committed to, being “true providers” of universal service should receive the ETC designation.

To assist the Commission, MECA offers the following qualifications and requirements that it believes the Commission should adopt when considering ETC applications: 1) A carrier must demonstrate its ability and willingness to provide all supported services throughout the service area. 2) To fulfill the advertising requirement, an ETC must emphasize its universal service obligation to offer service to all consumers in the service area. 3) A carrier must have formal arrangements in place to provide service where facilities have yet to be built. 4) A carrier must have a plan for building out its network once it receives ETC status and must make demonstrative progress toward achieving its plan to retain its status. 5) A carrier must demonstrate that it is financially stable.

In addition to public interest principles and minimum qualifications and requirements, MECA urges adoption of the following policies that it believes the Commission should adhere to when reviewing ETC applications involving rural areas: 1) ETC designations in rural areas should be made at the study area level (an ILEC’s entire service territory within one state). 2) The Commission should ensure that competitive ETCs will be capable of providing high-quality service to all customers in the service area should the rural ILEC find it necessary to relinquish its

own ETC designation. 3) Any service quality standards, reporting requirements, and customer billing requirements established by the Commission should apply equally to all ETCs in the state. 4) The Commission should retain the authority to decertify any ETC that is not meeting any of the Commission's qualifications and requirements.

In short, MECA does not believe that granting NPI's application would be in the public interest. MECA also supports deferring the decision on NPI's application until the Federal-State Joint Board clarifies the process for designating ETCs.

Staff

The Staff's testimony references background material that it believes will assist the Commission in determining whether granting NPI's application would be in the public interest. In so doing, the Staff directs attention to portions of the MTA and the federal Act that support the development of competition and use of competition to make available quality telecommunications services at prices that are just, reasonable, and affordable in rural, high-cost areas. The Staff also presents a number of questions for the Commission's reflection. The Staff would like more guidance as to the definition of "public interest." The Staff suggests that healthy competition is the most significant factor in a public interest analysis, followed closely by choice and reasonable rates. In the end, the Staff sees no reason to further delay or deny NPI's ETC designation.

III.

DISCUSSION

ETC Designation

Pursuant to 47 USC 214(e)(2), the Commission may designate more than one carrier in a rural area as an ETC if the Commission finds doing so consistent with the public interest, convenience, and necessity. The parties to this proceeding opposing NPI's application argue that granting NPI's application is not in the public interest. The Commission disagrees. On numerous occasions, the Commission has found that competition can be advantageous to the citizens of this state. In this case, designating NPI as an ETC is in the public interest because it is likely to promote competition and provide benefits to customers in rural, high-cost areas by increasing customer choice, while promoting innovative services and new technologies, and encouraging affordable telecommunications services. Further, NPI provides service where there are few, if any, competitive local exchange carriers.

The Commission disagrees with the significance of the numerous arguments advanced by the opposing parties. To the extent that the opposing parties claim that wireless service is inferior to landline service, the Commission responds that customers should not be denied an opportunity to determine which of these services best meets their needs. In response to the argument that wireless service providers are not subject to the same regulations designed to protect customers, the Commission finds sufficient protection for customers in their right to choose not to use wireless service and to choose from whom to take service. To the extent that the opposing parties are concerned about the effects on themselves of competition from wireless carriers, the Commission does not agree that the public interest requires that they be protected from competition. Moreover, concerns over the effect of competition on the universal service

mechanism are better addressed by the FCC, which is responsible for disbursing the federal universal service funds.

There is ample precedent in support of a wireless carrier's designation of ETC status. On at least two prior occasions, this Commission has granted ETC status to wireless carriers.⁷ In addition, numerous ETC proceedings involving competitive carriers, including wireless carriers, have taken place at the FCC and before other state commissions with the competitive carrier ultimately being granted ETC status.⁸ The Commission provided parties an opportunity to voice their concerns about the granting of ETC status to a wireless carrier by conducting an evidentiary hearing. Virtually every argument raised by the parties in opposition to NPI's application, however, has been addressed previously. No new information was brought to the Commission's attention that would persuade the Commission that designating a competitive carrier ETC status in an area served by a rural ILEC would be contrary to the public interest.

Furthermore, the Legislature has decided that the Commission should not regulate wireless service. For that reason, the Commission must also decline to adopt the numerous conditions proposed, such as requiring NPI to assume carrier of last resort responsibilities, which would require that the Commission regulate wireless service. Consistent with prior designations,

⁷ See, the November 20, 2001 order in Case No. U-13145 and the December 6, 2002 order in Case No. U-13618.

⁸ See, e.g., *RCC Minnesota, Inc. et. al. Request for Designation as Eligible Telecommunications Carrier*, Order, Maine Public Utilities Commission Docket No. 2002-344 (May 13, 2003); *In the Matter of Federal State Joint Board on Universal Service Cellular South License Inc. Petition for Designation as an Eligible Telecommunications Carrier Throughout its Licensed Service Area in the State of Alabama*, Memorandum Opinion and Order, CC Docket No. 96-45, DA 02-3317 (rel. Dec. 4, 2002); *In the Matter of Federal State Joint Board on Universal Service RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunication Carrier Throughout its Licensed Service Area in the State of Alabama*, Memorandum Opinion and Order, CC Docket No. 96-45, DA 02-3181 (rel. Nov. 2, 2002).

however, the Commission reserves the right to conduct audits as needed to determine that the funds are used for permitted purposes.

The Commission declines CenturyTel's and MECA's recommendation to defer its determination on NPI's application until after the Federal-State Joint Board provides further clarity on ETC designations. At this point, there is no time frame in which the Joint Board will act. The Commission, however, has been urged by the FCC to act upon ETC applications within 180 days and the end of that period with respect to this application is fast approaching. The Commission believes the better course of action is to act upon NPI's application within the desired timeframe and take recommendations of the Federal-State Joint Board into account when deciding future cases.

Service Area

NPI also requests that the Commission establish a "service area" for purposes of determining universal service support. The federal Act defines the term "service area" to be a "geographic area established by a State commission for the purpose of determining universal service obligations and support mechanisms." 47 USC 214(e)(5). As stated above, NPI requests that its licensed service area be the designated service area for universal service support. NPI specifically requests ETC status in each of the counties covered by its service area and the exchanges of the ILEC located therein.

Additionally, NPI requests that the Commission petition the FCC to redefine the service areas of the incumbent carriers within its licensed territory, including SBC Ameritech Michigan, CenturyTel, Hiawatha, Upper Peninsula Telephone Company, and Verizon North Inc. NPI's witness testified that NPI is not able to serve the entire study area of each of these companies because of limitations on its FCC license to provide wireless service.

CenturyTel and MECA oppose NPI's service area proposal. CenturyTel and MECA argue that NPI must serve the same service area as the rural ILEC. CenturyTel contends that redefining a rural carrier's service area acts as a disincentive for an additional ETC to serve the most rural parts of a relevant study area. CenturyTel contends that the goal of universal service would be better served by requiring "ETCs to expand their horizons." CenturyTel Brief, p. 18. CenturyTel is also concerned that if additional ETCs are not required to serve a rural ILEC's entire study area, then there is a greater risk of "cream-skimming," where the additional ETC can choose to provide service to lower cost customers without being subject to providing service to attendant higher cost customers while receiving the same level of universal service support as the rural ILEC. MECA also raises concerns about what it described as significant administrative burdens for an ILEC as a result of study area changes. MECA describes how an ILEC's accounting and auditing procedures are built around their existing study areas.

The Commission appreciates the concerns raised by CenturyTel and MECA, but declines to accept the proposal that the ETC's service area should encompass the ILEC's entire study area. In granting ETC status to RFB Cellular and Thumb Cellular, the Commission did not require the wireless carrier to provide service to the entire study area of the rural ILEC.

The Commission, however, also has concerns with NPI's proposals. The Commission declines to redefine the ILEC's study area or to grant NPI's ETC designation based upon political boundaries, such as underlying counties. The study areas of rural ILECs have existed for many years and many accounting and other administrative tasks are based upon those study areas. The Commission is persuaded that designating a service area for purposes of universal service support based upon political boundaries is unwise. The Commission finds that there are administrative efficiencies to be achieved by ensuring that designated service areas do not cross the geographic

boundaries of other relevant telecommunications areas. Political boundaries, for instance, are not congruent with LATAs, exchanges, study areas, or wire centers that are relevant geographic areas for telecommunications purposes.

The Commission is sensitive to the concern that administrative difficulties could abound if every ETC applicant desires its own service area designation. The Commission also appreciates the “cream-skimming” issues that could exist if every ETC applicant is able to carefully craft its own desired service area. Consequently, the Commission has decided to delineate service areas for purposes of universal service support by exchanges. In so doing, the Commission finds that the “cream-skimming” concerns are alleviated because NPI has not specifically picked the areas in which it will serve, but instead the areas were defined in the FCC’s wireless licensing process. Additionally, exchanges tend to encompass many types of customers, including rural and high-cost customers. The Commission is persuaded that NPI is not targeting any specific area or that serving any of the partial study areas would result in a windfall due to service to a highly-populated area. Much of the area covered by NPI’s wireless carrier license is in very rural parts of Michigan. The Commission is also convinced that designating service areas utilizing entire exchanges will minimize the administrative burden on rural telephone companies to calculate costs at something other than a study area level. This approach requires affected ILECs to disaggregate into service areas that are coterminous with existing telecommunications boundaries for which costs are already calculated.

Finally, the Commission rejects NPI’s request that the Commission petition the FCC for the necessary changes to implement this order. Rather, the Commission finds that the burden should be on NPI to obtain whatever relief is necessary, such as changing the geographic scope of its

wireless carrier license and petitioning the FCC for concurrence with the Commission's determinations herein.

The Commission FINDS that:

- a. Jurisdiction is pursuant to 1991 PA 179, as amended, MCL 484.2101 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; and the Commission's Rules of Practice and Procedure, as amended, 1999 AC, R 460.17101 et seq.
- b. NPI should be designated as an ETC for the purpose of receiving federal universal service funds.
- c. NPI's designation as an ETC is in the public interest.
- d. NPI's service area for purposes of determining universal service obligations and support mechanisms should be coterminous with established exchanges.
- e. NPI should be directed to file in this docket (and serve upon the other parties) a listing of the exchanges where it currently provides service or intends to provide service under its license and for which it wishes to receive universal service support and is able to meet universal service obligations.
- f. The granting of NPI's ETC status should be conditioned upon the Commission's reservation of its right to audit all expenditures of these universal service funds.
- g. NPI's ETC designation should be subject to the annual Commission re-certification process.

THEREFORE, IT IS ORDERED that:

A. NPI-Omnipoint Wireless, LLC, is designated as an eligible telecommunications carrier for the purpose of receiving federal universal service funds.

B. NPI-Omnipoint Wireless, LLC's service area for purposes of determining universal service obligations and support mechanisms is to be coterminous with established exchanges.

C. NPI-Omnipoint Wireless, LLC, is directed to file in this docket (and serve upon the other parties) a listing of the exchanges where it currently provides service or intends to provide service under its license and for which it wishes to receive universal service support and is able to meet universal service obligations.

D. NPI-Omnipoint Wireless, LLC's eligible telecommunications carrier designation is conditioned upon the Commission's reservation of its right to audit all expenditures of these universal service funds.

E. NPI-Omnipoint Wireless, LLC's eligible telecommunications carrier designation is subject to the annual Commission re-certification process.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION

/s/ J. Peter Lark
Chair

(S E A L)

/s/ Robert B. Nelson
Commissioner

/s/ Laura Chappelle
Commissioner

By its action of August 26, 2003.

/s/ Robert W. Kehres
Its Acting Executive Secretary

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26.

MICHIGAN PUBLIC SERVICE COMMISSION

Chair

Commissioner

Commissioner

By its action of August 26, 2003.

Its Acting Executive Secretary

In the matter of the application of)
NPI-OMNIPOINT WIRELESS, LLC,)
for designation as an eligible telecommunications)
carrier pursuant to Section 214(e)(6) of the)
Communications Act of 1934.)
_____)

Case No. U-13714

Suggested Minute:

“Adopt and issue order dated August 26, 2003 approving the application of NPI-Omnipoint Wireless, LLC, for designation as an eligible telecommunications carrier for purposes of receiving universal service support, as set forth in the order.”

Exhibit D

**Dobson Cellular Systems, Inc.'s
September 17, 2004 Supplemental Filing**

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Application of Dobson)
Cellular Systems, Inc. for Designation as)
an Eligible Telecommunications Carrier)
Pursuant to Section 214(e)(2) of the)
Communications Act of 1934)
_____)

Case No. U-14257

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Attorneys for Dobson Cellular Systems, Inc.

SUPPLEMENTAL FILING

Dobson Cellular Systems, Inc. ("Dobson"), by its attorneys Clark Hill, PLC and Briggs and Morgan, P.A., submits this Supplemental Filing to the Michigan Public Service Commission (the "Commission") to provide additional information supporting its request for designation as an eligible telecommunications carrier ("ETC") and redefinition of the service area requirement. The additional information set forth below is incorporated by reference into and further supports the Verified Application filed in this docket on September 1, 2004.

I. INTRODUCTION

Dobson has requested ETC designation in 1) certain non-rural telephone company wire centers wholly contained within Dobson's licensed service area; 2) rural telephone company study

areas that are wholly contained within Dobson's licensed service area; and 3) individual rural telephone company wire centers that are wholly contained within Dobson's licensed service area.¹ For the third of these three categories, Dobson has requested that the Commission redefine the service area requirement pursuant to 47 U.S.C. § 214(e)(5) and 47 C.F.R. § 54.207.

For areas served by a rural telephone company, Section 214(e)(5) of the Federal Communications Act of 1934, as amended (the "Act") provides that a competitive ETC can be designated only throughout a rural telephone company's study area. A rural telephone company's "study area" is generally defined as all of the company's existing certificated exchange areas in a given state. However, the Federal Communications Commission ("FCC") has long recognized that requiring a new telecommunications provider, especially a wireless provider, to conform its designated service area to the study area of the incumbent rural telephone company may give the rural telephone company an unfair advantage.² The Commission promulgated 47 C.F.R. § 54.207 to avoid such anti-competitive results. FCC Rule 54.207 provides that the service area requirement is subject to redefinition if the FCC and the State Commission jointly establish a different service area. This is commonly done by redefining the rural telephone company's service area on a wire center basis so that the ETC applicant can be designated only in those wire centers that it serves.³

¹ The specific wire centers and study areas in each of these three categories were set forth in Exhibit D to Dobson's application.

² *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 97-157, ¶ 185 (rel. May 8, 1997) ("*Universal Service Order*").

³ See, e.g., *In the Matter of Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In The Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum Opinion and Order, FCC 03-338, (rel. Jan. 22, 2004) ("*Virginia Cellular*"); *In the Matter of Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum Opinion and Order, FCC 04-37, (rel. Apr. 12, 2004) ("*Highland Cellular*").

Dobson has specifically requested that the Commission redefine the service area requirement for purposes of facilitating its designation in the areas served by eight incumbent carriers within its licensed territory: Hiawatha Telephone Co. Inc. ("Hiawatha"), Pigeon Telephone Company ("Pigeon"), Upper Peninsula Telephone Company, ("Upper Peninsula"), Verizon North, Inc.-MI (ALLTEL) ("Verizon North"), Wolverine Tel. Co., ("Wolverine"), CenturyTel Midwest-Michigan, Inc. ("CenturyTel Midwest-Michigan"), CenturyTel of Michigan, Inc. ("CenturyTel Michigan"), and CenturyTel of Upper Michigan, Inc. ("CenturyTel Upper Michigan").⁴ Dobson is able to serve certain wire centers within each of these companies' areas, but is not able to serve the entire study area of each of these companies because of limitations on its FCC license to provide wireless service. Absent redefinition of the service area requirement, Dobson would be prohibited from being designated as a competitive ETC in any of the wire centers within these rural telephone companies' study areas where it can serve today. The wire centers for which redefinition is sought are set forth in Exhibit A, attached hereto.

To effectuate the redefinition of these rural telephone companies' service area requirement for the purpose of designating Dobson as an ETC in the wire centers set forth in Exhibit A, the FCC and the Commission must act in concert to redefine the service area requirement. The sole requirement in redefining the service area requirement is that the Commission and FCC each give full consideration to three factors set forth in recommendations made by the Federal-State Joint Board on Universal Service, and explain their application of

⁴ The Commission has previously acted to redefine the service area of each of the named carriers to the individual wire center level. *See In the Matter of the Application of NPI-Omnipoint Wireless, LLC, for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act of 1934*, Case No. U-13714, *Opinion and Order*, pp. 13-15 (rel. Aug. 26, 2003) ("NPI Order"); *In the Matter of the Application of Alltel Communications, Inc., for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934*, Case No. U-13765, *Opinion and Order*, pp. 13-15 (Sept. 11, 2003) ("Alltel Order").

those factors. 47 U.S.C. § 214(e)(5); 47 C.F.R. § 54.207(b). The three factors set forth in the Joint Board's recommendations are: (1) the risk that an ETC applicant will seek designation only in low cost, high support areas, a practice referred to as "cream skimming"; (2) any effect redefinition may have on the rural telephone company's regulatory status; and (3) any additional administrative burdens that may result from redefinition.

As more fully explained below, the first factor may be assessed is by conducting a population density analysis – comparing the population density per square mile for the areas in which the applicant is seeking ETC designation to the population density per square mile for the areas in which the applicant is not seeking ETC designation. The primary purpose of this Supplemental Filing is to provide the Commission with the information needed for the population density analysis in this docket. This Supplemental Filing also addresses other factors relevant to the Commission's consideration of a request for redefinition of the service area requirement.

II. DOBSON'S REQUESTED REDEFINITION DOES NOT CREATE A RISK OF EITHER INTENTIONAL CREAM SKIMMING OR THE UNINTENTIONAL EFFECTS OF CREAM SKIMMING

A. Dobson Is Not Engaging In Any Intentional Cream skimming

Dobson is seeking redefinition only in areas where it is not licensed by the FCC to serve the entire Michigan study area of the rural telephone company study areas. In the areas where Dobson is requesting redefinition, the Company is seeking redefinition of the service area from the study area to the full wire center level.⁵

⁵ Thus, Dobson is not seeking redefinition to a less-than-wire-center level. The FCC addressed partial wire center redefinition in *Highland Cellular*, ¶ 33. The concerns addressed in *Highland Cellular* are not present in Dobson's Application because all of the wire centers for which Dobson is seeking redefinition are located entirely within its FCC licensed service area boundaries.

Dobson is seeking ETC designation in each wire center located fully within its FCC-licensed boundaries, subject to the redefinition of the service area requirement. The FCC has expressly rejected the argument that a wireless carrier seeking ETC designation in all of the wire centers within its FCC-licensed boundaries is engaging in intentional cream skimming. *Virginia Cellular*, ¶ 32. In other words, cream skimming concerns are eliminated because Dobson has not specifically picked the areas in which it will serve, but instead seeks to serve all possible areas, limited only by its FCC's wireless license. Since Dobson is seeking designation for all wire centers entirely located within the scope of its licensed boundaries in each study area, the Commission should conclude there is no evidence of any intentional cream skimming.

B. Dobson's Designation Will Not Result In Any Effects Of Cream skimming

The FCC has noted that in certain situations, an ETC applicant's request for redefinition could – through no fault of the applicant – have the unintended effect of cream skimming in particular rural telephone company study areas. *Virginia Cellular*, ¶ 33. The FCC has determined that the risk of such inadvertent cream skimming effects may be assessed by conducting a population density analysis: comparing the population density of the wire centers within the rural telephone company study area where ETC designation is requested to the population density of the wire centers within the rural telephone company study area where ETC designation is not sought. *Virginia Cellular*, ¶ 34; *Highland Cellular*, ¶ 28.

Using publicly available information regarding the area and population of each wire center, Dobson has calculated the population density per square mile for the areas in which the Company is seeking ETC designation and for the areas in which it is not seeking ETC designation. A table comparing the population density per square mile for those areas is attached as Exhibit B hereto. Spreadsheets detailing the underlying data, including the area, population,

and population density for each wire center within each rural telephone company study area are attached as Exhibit C hereto.

The population density analysis set forth in Exhibit B confirms that no potential effects of cream skimming will result from Dobson's redefinition request in this docket. Specifically, in five of the eight rural telephone company study areas (Hiawatha, Pigeon, Verizon North, CenturyTel Midwest-Michigan, and CenturyTel Michigan), the population density is lower in the areas in which Dobson is seeking ETC designation than in the areas in which Dobson is not seeking designation. In the remaining three study areas (Upper Peninsula, Wolverine, and CenturyTel Upper Michigan), the population density is only slightly higher in the areas in which Dobson is seeking ETC designation as compared to the areas in which Dobson is not seeking designation. The variations in population density are not statistically significant for any of the study areas.

As part of the process of considering whether an ETC applicant's redefinition request may result in the inadvertent effects of cream skimming, the availability of disaggregating universal service support must also be considered. If a rural LEC is concerned that cost differentials throughout its study area may lead to the possibility of cream skimming, that company may file to target, or disaggregate, the support it receives. 47 C.F.R. § 54.315. By disaggregating and targeting support to the higher and lower cost areas, the risk of cream skimming is eliminated since the amount of support a competitive ETC receives in the wire centers it serves is based on the disaggregated amount available to the incumbent. 47 C.F.R. § 54.307.

Accordingly, the results of the population density analysis taking into account any disaggregation of the levels of support received by the incumbent carriers eliminate any concerns

of the effects of cream skimming. In this case, three of the rural telephone companies in whose service areas Dobson is seeking ETC designation (CenturyTel Midwest-Michigan, CenturyTel Michigan, and CenturyTel Upper Michigan) have already filed to disaggregate and target their high-cost support.⁶ The results of the population density analysis for those study areas therefore become irrelevant, because disaggregating the study area, by definition, eliminates any concern of cream skimming in that area.

For example, in the CenturyTel Upper Michigan study area, the population density for the wire centers in which Dobson is seeking designation is 22.91 persons per square mile, whereas the population density for the wire centers in which Dobson is not seeking designation is 10.68. Standing alone, these figures might be cause for concern, because Dobson would arguably be seeking designation in more densely populated areas (which presumably are lower cost areas to serve). However, CenturyTel Upper Michigan has already filed to disaggregate support, which results in the support being targeted to its higher cost wire centers. Therefore, the fact that Dobson is seeking designation in what might appear to be lower-cost wire centers becomes moot. Dobson will receive support in an amount equal to that which CenturyTel Upper Michigan receives in each given wire center. If Dobson serves a high-cost wire center, it will receive the higher level of support; if Dobson serves a low-cost wire center, it will receive a lower level of support.

Moreover, targeting of support through the disaggregation process remains an option to the rural LECs that have not already filed to do so.⁷ A rural LEC's choice not to target support

⁶ See <http://www.universalservice.org/hc/disaggregation/maps/default.asp>, the Universal Service Administrative Company's website resource used to list those rural telephone companies that have disaggregated their support.

⁷ See *Virginia Cellular*, ¶ 35, fn 112; 47 C.F.R. § 54.315.

indicates that the rural LEC does not perceive cream skimming to be a concern within its study area.⁸ Thus, although the population density analysis shows that the population density within the Wolverine and Upper Peninsula wire centers where Dobson seeks ETC designation is slightly higher than within the Wolverine and Upper Peninsula wire centers where Dobson can not seek ETC designation, the effects of cream skimming should nevertheless be of little concern. If Wolverine and Upper Peninsula were concerned about cream skimming, they would have initiated proceedings to disaggregate their support.

This is especially so because Wolverine and Upper Peninsula's study areas have been the subject of prior redefinition analyses by the Commission. Redefinition of Upper Peninsula's study area was considered by the Commission in the NPI proceeding⁹ – the proceeding from which Dobson's current Application is derived.¹⁰ The Commission determined that NPI was "not targeting any specific area" and concluded that there was no concern that "serving any of the partial study areas would result in a windfall due to service to a highly populated area." *NPI Order*, p. 15. Because the Commission found in the *NPI Order* that the effects of cream skimming were not a concern with regard to the Upper Peninsula study area, and Dobson is currently serving the same service areas as NPI served at the time of the *NPI Order*, there can be

⁸ See *In The Matter of the Application of N.E. Colorado Cellular, Inc. to Re-Define the Service Area of Eastern Slope Rural Telephone Association, Inc., Great Plains Communications, Inc., Plains Coop Telephone Association, Inc. and Sunflower Telephone Co., Inc.*, Docket No. 02A-444T, Decision Denying Exceptions and Motion to Reopen Record, Decision No. C03-1122, ¶ 38 (Aug. 27, 2003) (stating that decision of rural carriers not to target support "is probative evidence of the carriers' lack of concern with cream skimming.")

⁹ See *NPI Order*, pp. 13-14.

¹⁰ See Dobson's application, ¶¶ 3-7 for an explanation of how Dobson's current application is related to the NPI proceeding.

no concern that redefinition of Upper Peninsula's study area will result in the effects of cream skimming in this proceeding.

The same analysis applies with regard to Wolverine's study area. Redefinition of Wolverine's study area was considered and approved by the Commission in the *Alltel Order*. The Commission there concluded that Alltel, the ETC applicant, was "not targeting any specific area" and that redefinition would not "result in a windfall due to service to a highly-populated area." *Alltel Order*, p. 15. The Commission's prior finding that redefinition of Wolverine's study area would not create the effects of cream skimming indicates that there should be no concern about the effects of cream skimming when Wolverine's study area is redefined in this proceeding.

III. THE JOINT BOARD'S OTHER TWO FACTORS ARE NOT PRESENT HERE

A. Redefinition Will Not Affect the Unique Regulatory Status of Rural Telephone Companies

The Joint Board's second factor that must be considered as part of a redefinition analysis is whether the redefinition will have any effect upon the unique status enjoyed by rural telephone companies under the Act. In short, redefinition will have no effect upon rural telephone companies' regulatory status. Nothing in the service area redefinition process for an ETC applicant affects a rural carrier's statutory exemptions from interconnection, unbundling and resale requirements under Section 251(c). Redefining the rural telephone company service area requirement as requested herein will not compromise or impair the unique treatment of these companies as rural telephone companies under Section 251(f) of the Act. Even after their service areas are redefined for purposes of ETC designations, the companies will still retain the statutory exemptions from interconnection, unbundling and resale requirements under Section 251(c).

Additionally, the redefinition process does not affect the way in which the rural telephone companies calculate their embedded costs or the amount of per-line support they receive. As the FCC recently stated,

(1) the high-cost universal service mechanisms support all lines served by ETCs in rural areas; (2) receipt of high-cost support by [the applicant] will not affect the total amount of high-cost support that the incumbent rural telephone company receives; (3) to the extent that [the applicant] or any future competitive ETC captures incumbent rural telephone company lines to existing wireline subscribers, it will have no impact on the amount of universal service support available to the incumbent rural telephone companies for those lines they continue to serve; and (4) redefining the service areas of the affected rural telephone companies will not change the amount of universal service support that is available to these incumbents.

...

Under the Commission's rules, receipt of high-cost support by [a competitive ETC] will not affect the total amount of high-cost support that the incumbent rural telephone company receives.

Virginia Cellular, ¶¶ 41, 43; *see also Highland Cellular*, ¶ 40. Rather, the redefinition process only modifies the service area requirement for purposes of designating a competitive ETC. Thus, the incumbent carriers will retain their unique regulatory status as rural telephone companies under the Act consistent with the Joint Board's recommendations.

B. Redefinition Will Not Create Any Administrative Burdens

The third and final factor to consider is whether any administrative burdens might result from the redefinition of the service area requirement. A rural telephone company's universal service support payments are currently based on a rural company's embedded costs determined at the study area level. *Universal Service Order*, ¶ 189. The FCC has recently stated that:

[R]edefining the rural telephone company service areas as proposed will not require the rural telephone companies to determine their costs on a basis other than the study area level. Rather, the redefinition merely enables competitive ETCs to serve areas that are smaller than the entire ILEC study area. Our decision to redefine the service areas does not modify the existing rules applicable to rural telephone companies for calculating costs on a study area basis, nor, as a

practical matter, the manner in which they will comply with these rules. Therefore, we find that the concern of the Joint Board that redefining rural service areas would impose additional administrative burdens on affected rural telephone companies is not at issue here.

Virginia Cellular, ¶ 44 (emphasis added). Just as in *Virginia Cellular*, redefinition of the rural telephone company study areas in this proceeding will have no effect on the rural telephone companies' calculation of their costs. Redefinition will not create any additional burdens.

CONCLUSION

Dobson provides herein supplemental information showing that the redefinition of the service area requirement it seeks in this proceeding is appropriate and legally sound. The population density information presented herein shows that no unintended effects of cream skimming will result from Dobson's designation as an ETC in the wire centers of the rural telephone companies listed in Exhibit B. Dobson meets the requirements for ETC designation and the Commission should immediately designate it as an ETC in the wire center within the wire centers listed in Exhibit B, subject to the FCC's agreement in the redefinition.

Dated: September 17, 2004

CLARK HILL, PLC

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EXHIBIT A
RURAL TELEPHONE COMPANY STUDY AREAS PARTIALLY WITHIN
DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL	SERVICE AREA REDEFINED
AUGRMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
CHLKMIXI	310671	CenturyTel Midwest-Michigan, Inc.	R	
MCSTMIXI	310671	CenturyTel Midwest-Michigan, Inc.	R	
OMERMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	R	
ALNSMIXJ	310702	CenturyTel of Michigan, Inc.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
BNFLMIXI	310702	CenturyTel of Michigan, Inc.	R	
BRLKMIXI	310702	CenturyTel of Michigan, Inc.	R	
BRTSMIXI	310702	CenturyTel of Michigan, Inc.	R	
CEDRMIXI	310702	CenturyTel of Michigan, Inc.	R	
CRYSMIXI	310702	CenturyTel of Michigan, Inc.	R	
EMIRMIXJ	310702	CenturyTel of Michigan, Inc.	R	
EMPRMIXI	310702	CenturyTel of Michigan, Inc.	R	
GLARMIXI	310702	CenturyTel of Michigan, Inc.	R	
GLNEMIXI	310702	CenturyTel of Michigan, Inc.	R	
HALEMIXA	310702	CenturyTel of Michigan, Inc.	R	
HNORMIXI	310702	CenturyTel of Michigan, Inc.	R	
HOPEMIXI	310702	CenturyTel of Michigan, Inc.	R	
LKANMIXI	310702	CenturyTel of Michigan, Inc.	R	
LKCYMIXI	310702	CenturyTel of Michigan, Inc.	R	
LVRGMIXI	310702	CenturyTel of Michigan, Inc.	R	
MRRTMIXI	310702	CenturyTel of Michigan, Inc.	R	
MSTWMIXI	310702	CenturyTel of Michigan, Inc.	R	
SLKHMIXI	310702	CenturyTel of Michigan, Inc.	R	
STBYMIXI	310702	CenturyTel of Michigan, Inc.	R	
SXLSMIXI	310702	CenturyTel of Michigan, Inc.	R	
VCVLMIXI	310702	CenturyTel of Michigan, Inc.	R	
WHMRMIXI	310702	CenturyTel of Michigan, Inc.	R	
CDVLMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
DETRMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	
KNRSMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	
PKFDMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	
RDYRMIXG	310689	CenturyTel of Upper Michigan, Inc.	R	<i>NPI-Omnipoint – Case No. U-13714</i>
DRPKMIXI	310713	Hiawatha Telephone Co. Inc.	R	
ECKRMIXI	310713	Hiawatha Telephone Co. Inc.	R	
HLBRMIXI	310713	Hiawatha Telephone Co. Inc.	R	
PRDSMIXI	310713	Hiawatha Telephone Co. Inc.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>
ALBAMIXJ	310721	Pigeon Telephone Company	R	
LKNRMIXJ	310721	Pigeon Telephone Company	R	
TWNGMI01	310721	Pigeon Telephone Company	R	
AMBLMIXJ	310732	Upper Peninsula Telephone Company	R	<i>NPI-Omnipoint – Case No. U-13714</i>
CTPOMIXJ	310732	Upper Peninsula Telephone Company	R	
DRISMIXI	310732	Upper Peninsula Telephone Company	R	
GRHRMIXI	310732	Upper Peninsula Telephone Company	R	
MRVRMIXI	310732	Upper Peninsula Telephone Company	R	
RXTNMIXI	310732	Upper Peninsula Telephone Company	R	

**RURAL TELEPHONE COMPANY STUDY AREAS PARTIALLY WITHIN
DOBSON CELLULAR SYSTEMS, INC.'S LICENSED SERVICE AREA
(CONTINUED)**

WIRE CENTER CODE	STUDY AREA CODE	INCUMBENT TELEPHONE COMPANY	RURAL/ NON-RURAL	SERVICE AREA REDEFINED
SCPTMIXI	310732	Upper Peninsula Telephone Company	R	
ALGRMIXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	<i>NPI-Omnipoint - Case No. U-13714</i>
LPTNMLXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
PRSCMIXP	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
RSCYMIXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
STNGMIXJ	313033	VERIZON NORTH INC.-MI (ALLTEL)	R	
SNFRMIXI	310738	Wolverine Tel. Co.	R	<i>Alltel Communications, Inc. - Case No. U-13765</i>

EXHIBIT B
POPULATION DENSITY ANALYSIS OF THE RURAL TELEPHONE COMPANY
STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION

INCUMBENT TELEPHONE COMPANY	SERVICE AREA	TOTAL POPULATION	TOTAL AREA (Square Miles)	POPULATION DENSITY (per Square Mile)
Hiawatha Telephone Co. Inc.	Requesting Designation	1,243	726.42	1.71
	Not Requesting Designation	7,914	1,250.39	6.33
Pigeon Telephone Company	Requesting Designation	3,943	176.90	22.29
	Not Requesting Designation	2,581	60.76	42.48
Upper Peninsula Telephone Company	Requesting Designation	3,725	494.30	7.54
	Not Requesting Designation	6,244	1,392.63	4.48
Verizon North Inc. - MI (ALLTEL)	Requesting Designation	16,266	455.60	35.70
	Not Requesting Designation	93,108	964.38	96.55
Wolverine Telephone Co.	Requesting Designation	7,766	66.82	116.23
	Not Requesting Designation	13,835	164.91	83.89
CenturyTel Midwest- Michigan, Inc.*	Requesting Designation	12,732	257.27	49.49
	Not Requesting Designation	50,940	491.98	103.54
CenturyTel of Michigan, Inc.*	Requesting Designation	63,473	1,856.42	34.19
	Not Requesting Designation	43,668	661.68	66.00
CenturyTel of Upper Michigan, Inc.*	Requesting Designation	13,520	590.12	22.91
	Not Requesting Designation	9,377	877.66	10.68

* Indicates rural telephone companies that have elected to disaggregate support.

EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION

HIAWATHA TELEPHONE CO. INC.

WC Code	SAC	SAC NAME	Population	AreaSqMi	Pop Density	Application
DRPKMIXI	310713	Hiawatha Telephone Co. Inc.	256	286.784	0.892659	Y
ECKRMIXI	310713	Hiawatha Telephone Co. Inc.	225	121.327	1.8545	Y
GDMRMIXI	310713	Hiawatha Telephone Co. Inc.	441	80.2958	5.49219	
HLBRMIXI	310713	Hiawatha Telephone Co. Inc.	281	159.101	1.76618	Y
HWFRMIXI	310713	Hiawatha Telephone Co. Inc.	547	452.079	1.20996	
MNSGMIXJ	310713	Hiawatha Telephone Co. Inc.	5436	135.457	40.1308	
PRDSMIXI	310713	Hiawatha Telephone Co. Inc.	481	159.208	3.02121	Y
SENYMIXI	310713	Hiawatha Telephone Co. Inc.	524	347.556	1.50767	
SHNGMIXI	310713	Hiawatha Telephone Co. Inc.	966	235.002	4.1106	
Not Requesting Designation			Pops	7914		
			Area	1250.39		
			Density		6.33	
Designated Area			Pops	1243		
			Area	726.42		
			Density		1.71	

EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION
(CONTINUED)

PIGEON TELEPHONE COMPANY

WC Code	SAC	SAC NAME	Population	Area SqMi	Pop Density	Application
ALBAMIXJ	310721	Pigeon Telephone Company	1166	68.5221	17.0164	Y
LKNRMIXJ	310721	Pigeon Telephone Company	1510	64.2269	23.5104	Y
PGENMIXJ	310721	Pigeon Telephone Company	2581	60.7604	42.4783	
TWNGMI01	310721	Pigeon Telephone Company	1267	44.1506	28.6973	Y
Not Requesting Designation			Pops	2581		
			Area	60.76		
			Density		42.48	
Designated Area			Pops	3943		
			Area	176.90		
			Density		22.29	

EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION
(CONTINUED)

UPPER PENINSULA TELEPHONE COMPANY

WC Code	SAC	SAC NAME	Population	Area SqMi	Pop Density	Application
AMBLMIXJ	310732	Upper Peninsula Telephone Company	725	15.4552	46.9099	Y
CRNYMIXJ	310732	Upper Peninsula Telephone Company	1472	139.723	10.5351	
CTPOMIXJ	310732	Upper Peninsula Telephone Company	1488	70.0794	21.2331	Y
DNKNMIXI	310732	Upper Peninsula Telephone Company	575	95.2196	6.03867	
DRISMIXI	310732	Upper Peninsula Telephone Company	993	129.367	7.67586	Y
FLCHMIXI	310732	Upper Peninsula Telephone Company	969	208.814	4.64049	
FNRVMIXI	310732	Upper Peninsula Telephone Company	231	191.754	1.20467	
FTHRMIXI	310732	Upper Peninsula Telephone Company	343	72.5496	4.7278	
GRHRMIXI	310732	Upper Peninsula Telephone Company	175	26.5106	6.60114	Y
LKGOMIXI	310732	Upper Peninsula Telephone Company	216	186.928	1.15553	
MHGFMIXI	310732	Upper Peninsula Telephone Company	146	61.1924	2.38592	
MRNSMIXI	310732	Upper Peninsula Telephone Company	862	146.403	5.88785	
MRVRMIXI	310732	Upper Peninsula Telephone Company	73	50.0966	1.45718	Y
NLNDMIXI	310732	Upper Peninsula Telephone Company	148	11.2395	13.1679	
RXTNMIXI	310732	Upper Peninsula Telephone Company	235	132.427	1.77457	Y
SCPTMIXI	310732	Upper Peninsula Telephone Company	36	70.3664	0.511608	Y
SMLKMIXI	310732	Upper Peninsula Telephone Company	31	43.8133	0.707548	
WLLCMIXA	310732	Upper Peninsula Telephone Company	829	21.8095	38.011	
WTMQMIXI	310732	Upper Peninsula Telephone Company	422	213.181	1.97954	
Not Requesting Designation			Pops	6244		
			Area	1392.63		
			Density		4.48	
Designated Area			Pops	3725		
			Area	494.30		

Density			7.54
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EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION
(CONTINUED)

VERIZON NORTH INC. – MI (ALLTEL)

WC Code	SAC	SAC NAME	Population	Area SqMi	Pop Density	Application
ADSNMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	7021	97.7803	71.8038	
ALGRMIXJ	313033	VERIZON NORTH INC - MI (ALLTEL)	2054	70.0395	29.3263	Y
BRDAMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	4099	30.3297	135.148	
BRDGMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	5897	21.6718	272.105	
BURLMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	1445	30.1538	47.921	
FTBGMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	836	16.5812	50.4187	
GLNNMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	1340	16.4976	81.224	
GRGRMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	3022	26.8753	112.445	
HOMRMIXJ	313033	VERIZON NORTH INC - MI (ALLTEL)	4755	94.2559	50.4478	
LCTAMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	792	7.65499	103.462	
LMVLMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	19440	76.6033	253.775	
LPTNMIXJ	313033	VERIZON NORTH INC - MI (ALLTEL)	2156	75.6222	28.5101	Y
LWRNMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	4289	56.9809	75.2708	
MNTHMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	2694	36.578	73.6508	
MRNCMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	4303	60.6037	71.0023	
ONDGMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	3419	38.1727	89.5666	
PARMMIXJ	313033	VERIZON NORTH INC - MI (ALLTEL)	5916	65.1099	90.8618	
PLMNMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	4300	43.1667	99.6138	
PRSCMIXP	313033	VERIZON NORTH INC - MI (ALLTEL)	6164	115.415	53.4072	Y
RSCYMIXJ	313033	VERIZON NORTH INC - MI (ALLTEL)	2934	117.76	24.915	Y
RVJTMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	4523	51.2059	88.3296	
STBRMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	5139	72.596	70.789	
STNGMIXJ	313033	VERIZON NORTH INC - MI (ALLTEL)	2958	76.7603	38.5356	Y

SWYRMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	3074	19.9929	153.754	
TKNSMIXI	313033	VERIZON NORTH INC - MI (ALLTEL)	2190	51.9436	42.1611	
WBVLMIXJ	313033	VERIZON NORTH INC - MI (ALLTEL)	4614	49.6295	92.9688	
Not Requesting Designation			Pops	93108		
			Area	964.38		
			Density		96.55	
Designated Area			Pops	16266		
			Area	455.60		
			Density		35.70	

EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION
(CONTINUED)

WOLVERINE TEL. CO.

WC Code	SAC	SAC NAME	Population	Area SqMi	Pop Density	Application
FSTRMIXI	310738	Wolverine Tel. Co.	2162	29.6501	72.9172	
MGTNMIXI	310738	Wolverine Tel. Co.	10144	101.093	100.343	
MNGRMIXJ	310738	Wolverine Tel. Co.	1529	34.1655	44.7527	
SNFRMIXI	310738	Wolverine Tel. Co.	7766	66.8152	116.231	Y
Not Requesting Designation			Pops	13835		
			Area	164.91		
			Density		83.89	
Designated Area			Pops	7766		
			Area	66.82		
			Density		116.23	

EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION
(CONTINUED)

CENTURYTEL MIDWEST – MICHIGAN, INC.

WC Code	SAC	SAC NAME	Population	Area SqMi	Pop Density	Application
AUGRMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	3951	79.5534	49.6647	Y
BRCLMIXI	310671	CenturyTel Midwest-Michigan, Inc.	6585	53.0598	124.105	
BRNTMIXI	310671	CenturyTel Midwest-Michigan, Inc.	2166	44.743	48.4098	
CHLKMIXI	310671	CenturyTel Midwest-Michigan, Inc.	1750	43.675	40.0687	Y
CHSNMIXI	310671	CenturyTel Midwest-Michigan, Inc.	8832	98.3676	89.7857	
GDRCMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	6072	29.6384	204.869	
HDLYMIXI	310671	CenturyTel Midwest-Michigan, Inc.	5150	32.4934	158.494	
LTFDMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	2949	49.971	59.0142	
MCSTMIXI	310671	CenturyTel Midwest-Michigan, Inc.	5446	78.6904	69.2079	Y
MSHVMIXI	310671	CenturyTel Midwest-Michigan, Inc.	659	7.09204	92.921	
MTRSMIXI	310671	CenturyTel Midwest-Michigan, Inc.	10427	48.6414	214.365	
NLTHMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	2655	38.0228	69.8265	
OMERMIXJ	310671	CenturyTel Midwest-Michigan, Inc.	1585	55.3475	28.6373	Y
ORLNMIXI	310671	CenturyTel Midwest-Michigan, Inc.	2507	38.3881	65.3067	
SNFDMIXI	310671	CenturyTel Midwest-Michigan, Inc.	2938	51.5576	56.9848	
Not Requesting Designation			Pops	50940		
			Area		491.98	
			Density			103.54
Designated Area			Pops	12732		
			Area		257.27	
			Density			49.49

EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION
(CONTINUED)

CENTURYTEL OF MICHIGAN, INC.

WC Code	SAC	SAC NAME	Population	Area SqMi	Pop Density	Application
ALNSMIXJ	310702	CenturyTel of Michigan, Inc.	2904	42.8873	67.7123	Y
BNFLMIXI	310702	CenturyTel of Michigan, Inc.	2162	108.557	19.9158	Y
BRLKMIXI	310702	CenturyTel of Michigan, Inc.	2171	60.9504	35.6191	Y
BRTSMIXI	310702	CenturyTel of Michigan, Inc.	1235	48.6635	25.3784	Y
CAROMIXI	310702	CenturyTel of Michigan, Inc.	13782	163.761	84.1591	
CEDRMIXI	310702	CenturyTel of Michigan, Inc.	4181	94.1996	44.3845	Y
CRYSMIXI	310702	CenturyTel of Michigan, Inc.	4259	64.5119	66.0188	Y
EMIRMIXJ	310702	CenturyTel of Michigan, Inc.	1642	50.4128	32.5711	Y
EMPRMIXI	310702	CenturyTel of Michigan, Inc.	879	28.4021	30.9485	Y
GLARMIXI	310702	CenturyTel of Michigan, Inc.	1521	66.4858	22.8771	Y
GLNEMIXI	310702	CenturyTel of Michigan, Inc.	1596	157.42	10.1385	Y
HALEMIXA	310702	CenturyTel of Michigan, Inc.	3222	108.914	29.5831	Y
HNORMIXI	310702	CenturyTel of Michigan, Inc.	1824	65.5032	27.846	Y
HOPEMIXI	310702	CenturyTel of Michigan, Inc.	4999	79.3544	62.9959	Y
KNDEMIXI	310702	CenturyTel of Michigan, Inc.	2127	92.5879	22.9728	
LKANMIXI	310702	CenturyTel of Michigan, Inc.	7830	91.5103	85.5642	Y
LKCYMIXI	310702	CenturyTel of Michigan, Inc.	6290	146.656	42.8894	Y
LVRGMIXI	310702	CenturyTel of Michigan, Inc.	2684	123.11	21.8016	Y
MRLTMIXI	310702	CenturyTel of Michigan, Inc.	6016	109.155	55.1143	
MRRTMIXI	310702	CenturyTel of Michigan, Inc.	1332	128.967	10.3283	Y
MSTWMIXI	310702	CenturyTel of Michigan, Inc.	1192	139.631	8.53679	Y
NWPTMIXI	310702	CenturyTel of Michigan, Inc.	8987	35.3313	254.364	
PINCMIXJ	310702	CenturyTel of Michigan, Inc.	8959	147.573	60.709	

PTASMIXI	310702	CenturyTel of Michigan, Inc.	2207	35.059	62.951	
PTHPMIXI	310702	CenturyTel of Michigan, Inc.	1590	78.2105	20.3297	
SLKHMIXI	310702	CenturyTel of Michigan, Inc.	1319	34.1981	38.5694	Y
STBYMIXI	310702	CenturyTel of Michigan, Inc.	4840	47.6233	101.631	Y
SXLSMIXI	310702	CenturyTel of Michigan, Inc.	1913	69.5925	27.4886	Y
VCVLMIXI	310702	CenturyTel of Michigan, Inc.	1305	22.0938	59.0663	Y
WHMRMIXI	310702	CenturyTel of Michigan, Inc.	2173	76.7793	28.3019	Y

Not Requesting Designation	Pops	43668		
	Area		661.68	
	Density			66.00
Designated Area	Pops	63473		
	Area		1856.42	
	Density			34.19

EXHIBIT C
POPULATION DENSITY INFORMATION FOR THE RURAL TELEPHONE
COMPANY STUDY AREAS WITHIN WHICH DOBSON IS SEEKING REDEFINITION
(CONTINUED)

CENTURYTEL OF UPPER MICHIGAN, INC.

WC Code	SAC	SAC NAME	Population	Area SqMi	Pop Density	Application
CDVLMIXG	310689	CenturyTel of Upper Michigan, Inc.	2458	122.289	20.0999	Y
DETRMIXG	310689	CenturyTel of Upper Michigan, Inc.	1410	103.836	13.5791	Y
GLVRMIXG	310689	CenturyTel of Upper Michigan, Inc.	733	95.6146	7.6662	
GRDNMIXG	310689	CenturyTel of Upper Michigan, Inc.	1379	240.561	5.73243	
KNRSMIXG	310689	CenturyTel of Upper Michigan, Inc.	5355	26.9826	198.461	Y
MNTQMIXG	310689	CenturyTel of Upper Michigan, Inc.	7265	541.484	13.4168	
PKFDMIXG	310689	CenturyTel of Upper Michigan, Inc.	2475	186.04	13.3036	Y
RDYRMIXG	310689	CenturyTel of Upper Michigan, Inc.	1822	150.968	12.0688	Y
Not Requesting Designation			Pops	9377		
			Area	877.66		
			Density		10.68	
Designated Area			Pops	13520		
			Area	590.12		
			Density		22.91	